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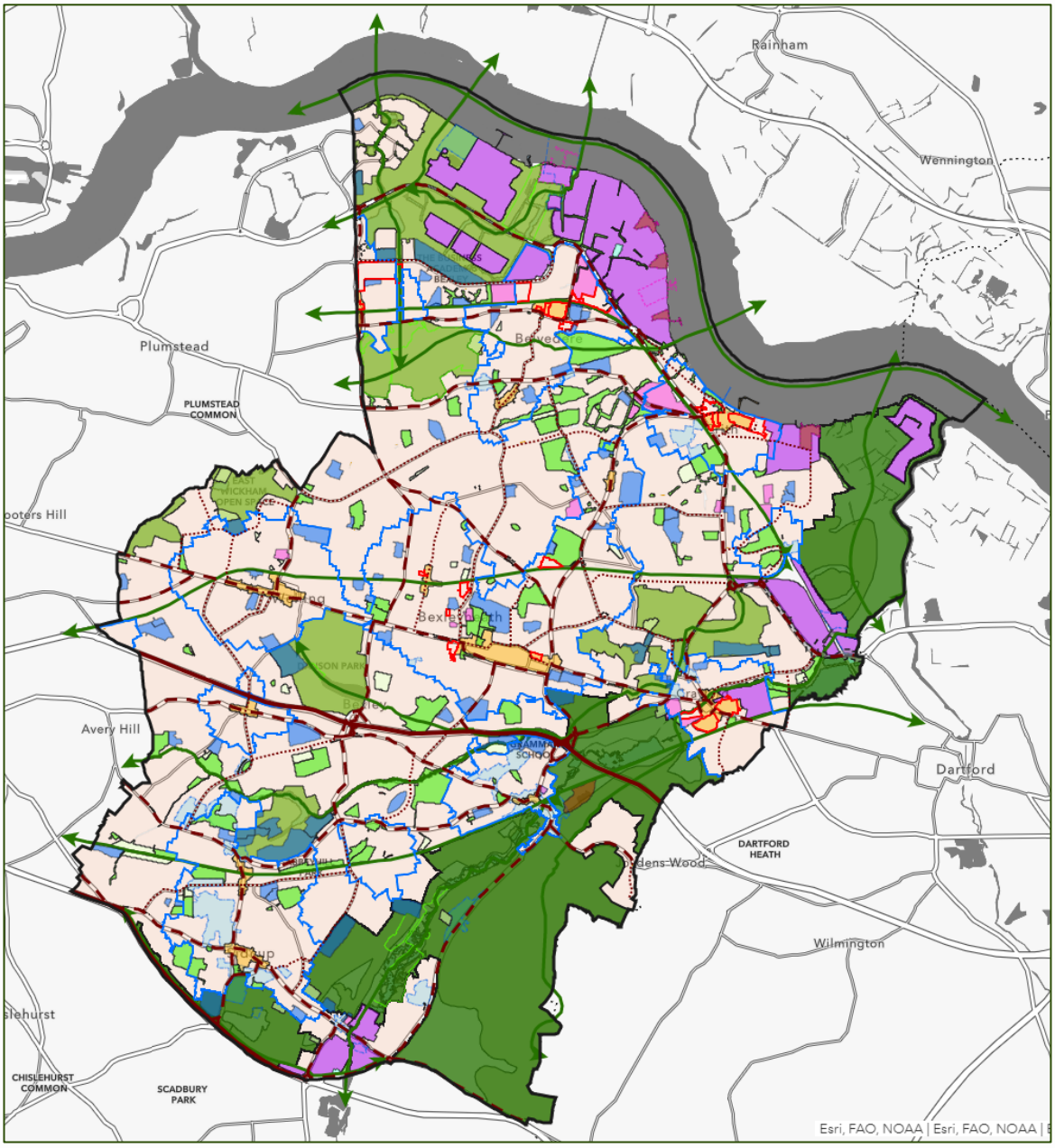
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Draft Local Plan

Proposed Submission Document

Regulation 19 Stage

May 2021



The purpose of this document

This document is the Draft Local Plan, as proposed to be submitted to the Secretary of State for independent examination. The Council will seek to deliver the principles of sustainable development through the final, adopted Bexley Local Plan and the development management process. The Development Plan for the area, which includes the Bexley Local Plan and the Mayor's London Plan, should be read in its entirety. Planning guidance produced by Government, the Mayor of London, and by the Council expands on Development Plan policies and has material weight when taking planning decisions.

The London Plan, as the spatial development strategy for London, provides the strategic framework. It does not however preclude boroughs from bringing forward policies relevant to their areas where locally specific circumstances and evidence suggests this would not undermine the objectives of the London Plan and where such an approach can be considered to be in general conformity with the London Plan. The Local Plan does this. It is also silent where the London Plan policy does not require a local approach.

The London Plan runs from 2019 to 2041, and the Local Plan from 2021 to 2038. Longer term London Plan objectives may fall beyond the timeframe of the Local Plan although the key objective of sustainable development underpins both documents.

[Please note that all references to the London Plan in this Draft Local Plan are for the new London Plan that came into effect on 2 March 2021]

The Local Plan contains strategic, non-strategic and site allocation (for residential and residential-led mixed-use development) polices along with supporting text, which take account of and are supported by:

- legal requirements related to the preparation of local plans including the duty to cooperate;
- Government planning policy and guidance (without seeking to repeat these)
- London Plan policy and guidance (without seeking to repeat these);
- integrated impact (IIA) and habitats regulations (HRA) assessments of the Local Plan;
- a whole Plan viability assessment; and,
- a proportionate evidence base (including evidence underpinning the London Plan), in the form of plans and strategies, studies, reports, technical papers and assessments.

Reviews at least every five years are a legal requirement for all local plans. The Council's review of its Local Plan began in 2017. This Local Plan is intended to replace, in full, the Bexley Core Strategy and remaining extant policies of the Bexley Unitary Development Plan and Proposals Map. The Local Plan has been shaped by effective engagement with residents, businesses, local groups and statutory consultees in line with the Bexley Statement of Community Involvement. The Local Plan has taken account of comments received during the consultation process, and the evidence justifies the approaches taken in the policies and provides the direction for policies to be implemented.

Local Plan strategic policies are prefixed 'SP,' non-strategic, development management policies prefixed 'DP,' and site allocation policies prefixed 'SA.' The first two policy types are set out within the topic-based chapters in Part 1 of the Local Plan and the third policy type set out within the site allocations for residential, or residential-led mixed-use development in Part 2 of the Local Plan. The site allocations are area specific and prefixed by their sustainable development location (e.g., Bexleyheath sites are prefixed BXH). The site allocations are not strategic allocations.

Annexes set out indicators for monitoring local plan policies and a glossary of terms and abbreviations (after Part 1), and a detailed local plan housing trajectory (after Part 2). Land-use designations are set out on the submission policies map. The Local Plan is accompanied by an Infrastructure Delivery Plan.

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PART 1: STRATEGIC AND NON-STRATEGIC POLICIES

1. Bexley's growth: delivering sustainable communities

Setting the context: Bexley's growth narrative

Related Council overarching strategies

Bexley Growth Strategy
#BrilliantBexley, Shaping our future together
Connected Communities Strategy

1.1 One of the characteristics of Bexley is that people who live in the borough identify strongly with their local neighbourhoods, such as Welling, Bexleyheath or Erith. Residents are committed to the local neighbourhood and enthusiastic in their contributions to their communities. There are a wide range of active community and voluntary groups, spanning support groups, business, the arts, sport and the environment.

1.2 Regionally, London's growing population is driving a renewed interest to the east. Locally, Bexley's population is also increasing significantly. Currently, this growth in the size and nature of the population has largely been accommodated by intensification in the use of the existing housing stock, creating additional pressures on local services, including education.

1.3 The population of Bexley will change significantly over the next few decades. The north of the borough will grow the most, and Bexley will become more diverse. Bexley has almost 248,000 residents and is predicted to grow to around 277,000 by the end of the Plan period. This has increased from 232,000 in 2011 (Census data), when Erith, Belvedere and Thamesmead East had the largest populations in the borough of around 12,000 residents each. Notwithstanding this, the borough is not particularly densely populated for London – with only 38.3 people per hectare of land – making Bexley the fifth lowest residential density of all London boroughs.

1.4 By 2041, it is predicted that Erith will remain the highest populated area in the borough with over 17,000 residents, which is the largest growth in Bexley by volume and percentage. Wards in Bexleyheath and Crayford follow with almost 15,000 residents in each area.

Local plan vision: growth that benefits all

1.5 Government's National Planning Policy Framework sets out a chapter on Plan-making, noting that: "*The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings.*"

1.6 The Leader's Foreword to the Bexley Growth Strategy states: "*Bexley is about far more than building homes and workplaces, we want to create sustainable, healthy, high-quality neighbourhoods where people choose to live, play, learn and earn. Further transport improvements could enable us to develop large, underused sites around stations in the north of the borough. These better-connected places could see new higher density neighbourhoods offering a range of homes for all life stages supported by healthy streets with 'walk to' facilities and high-tech infrastructure, and access to a variety of good quality jobs both locally and in economic centres outside the borough.*"

1.7 *Connected Communities*, the Council's strategy for supporting and investing in community development, sets out how we will work with local people who want to take positive action to

support the people and places that they care about. Growth that benefits all means that planned growth should be understood (why it's happening, and when) by the people who will be impacted by, and benefit from it. The strengths of existing communities, connected to new communities, will build the cohesive and successful communities of the future, with enough provision for schools, GP surgeries, and cultural and community facilities.

1.8 Working with our communities and partners we want to create an environment in which everyone in Bexley can take a full part in the social, cultural and economic wealth of the borough. This can be achieved by creating healthy communities, workplaces and homes; healthy environments, built, green and blue spaces; and economic independence and a thriving local economy.

1.9 The Council's Corporate Plan *#BrilliantBexley* sets out five key outcomes that have spatial elements that are reflected in the local plan. These five key outcomes are:

- Growth that benefits all
- Clean and green local places
- Strong and resilient communities and families
- Living well
- Innovations and self-sufficiency

Bexley Local Plan vision for sustainable growth

As set out in our Growth Strategy, Bexley will play a key part in helping London grow sustainably while we continue to respect the borough's overall character and identity. We have a key role in place shaping and to ensure that our communities, new and old, are connected, happy and prosperous.

A well-connected borough, both within and beyond Bexley, provides the key to securing growth opportunities for residents and businesses. People across the borough will have a better quality of life and improved health and wellbeing, supported by high-quality housing, rewarding employment opportunities and effective local services and facilities.

Good growth will be secured by focussing new residential development in and around our main town centres and other parts of the borough that are well-connected by public transport. We will make the most of Bexley's riverside location and industrial heritage.

Shopping, culture and leisure facilities will be vibrant, supported by innovative industries and businesses. Core industrial areas retained for employment uses will be improved, diversified and intensified, fostering the growing movement of artisans and other manufacturers.

The borough's valued character, heritage and quality open spaces will be preserved and enhanced. The natural environment will be protected for the future through net gains for biodiversity, and the management of air and water quality, flood risk and other effects of climate change.

Table 1: Bexley's vision for sustainable growth

1.10 The Corporate Plan's key outcome of 'Growth that benefits all,' states that:

"*Growth can significantly improve the lives of all who live in, work and visit Bexley, bringing much needed investment, creating new homes and jobs. We will think carefully about what type of growth we need, where we want it and when. Growth will be sustainable and will protect people's lifestyles, improving the quality of life for our residents. We will ensure that Growth is properly supported by the right infrastructure and that we protect all the things that make Bexley a good place to live and work, building on our proud legacy, character and identity.*"

Spatial objectives for the Local Plan

1.11 In line with Government guidance, the key spatial objective of a local plan is to set out the broad locations and specific allocation of land for different purposes; through designations showing areas where particular opportunities or considerations apply (such as protected habitats); and, through criteria-based policies, address the objectively assessed housing needs and other economic, social and environmental priorities of the area; in order to contribute to the achievement of sustainable development.

Local Plan spatial objectives - principles of sustainable development

Social sustainability: encourage the creation of high-quality, well connected healthy lifetime communities that are mixed and balanced, safe, and well supported by infrastructure, local services, and cultural and education facilities, which offer a choice of living styles that appeal across generations.

Environmental sustainability: protect and enhance aspects of the natural and built environment, take account of, adapt to, and mitigate the impacts of climate change and flood risk and optimise the efficient management of existing and future resources and waste.

Economic sustainability: support the strengthening of a diverse local economy including denser and higher quality industrial premises; a network of vibrant and successful town centres; increased inward investment in new high technology and creative sectors supported by state-of-the-art digital connectivity; the development of skills; and improved accessibility to jobs in London and the wider south east.

Sustainable development is synonymous with good growth: ensure lasting places are created that work economically, socially, and environmentally in the long term to the lasting benefit of their residents and businesses.

These principles are basic concepts of land use planning and will be secured through the creation of:

lifetime communities, which offer a range of housing types enabling people to stay local and close to family and friends – building strong, stable, self-supporting communities and promoting mental health

high-quality environments, with safe, pleasant and accessible open spaces meeting current and future needs, well designed buildings and an outstanding cultural and heritage offer

safe, walkable neighbourhoods where everyday facilities are reached by walking and cycling, reducing car use, improving the environment and promoting health

transport-orientated development where higher density mixed-use development is concentrated around public transport and town centre nodes, thereby making the most efficient use of land in the best-connected areas

high-quality, sustainable employment areas in accessible locations offering a range of high-quality jobs

Table 2: The key spatial objectives of the local plan

1.12 The strategic and non-strategic (development management) policies and the spatial land use designations are designed to support the objectives of sustainable development. By abiding by these core objectives, growth can be positively shaped to the advantage of the people who live and work in the borough, ensuring that it unlocks a range of benefits whilst planning out any potential negative impacts.

1.13 The Integrated Impact Assessment (IIA) uses sustainability objectives and sub-objectives alongside other methodologies associated with health, equalities and biodiversity assessments to appraise the Local Plan. The IIA Report notes that the Plan's spatial objectives are '*broad ranging spanning key socio-economic and environmental themes. As a result, none of the Draft Local Plan objectives have been assessed as being incompatible with all of the IIA objectives whilst compatibilities have been identified with each IIA objective.*'

➲ SP1: Achieving sustainable development – the spatial strategy

Related plans, strategies and key evidence – why we need this policy

National Planning Policy Framework (NPPF)
The London Plan (March 2021)
Bexley Growth Strategy
Bexley Local Character Study
Local Plan Spatial Strategy Technical Paper

1.14 Government's National Planning Policy Framework (NPPF) sets out that local plans should provide a positive vision for the future, a framework for addressing housing needs and other economic, social and environmental priorities, and a platform for local people to shape their surroundings. Plans should be prepared with the objective of contributing to the achievement of sustainable development, and set out an overall strategy for the pattern, scale, and quality of development. Broad locations for development should be indicated on a key diagram, and land-use designations and allocations identified on a policies map.

1.15 The London Plan 2021, as the strategic development strategy for Greater London, provides the overarching strategy that plans for London's growth in a sustainable way. Table 4.1 of the London Plan sets ten-year targets for net housing completions for which each local planning authority should plan. Because of London's ability to plan strategically, boroughs can rely on these targets when developing their local plans and are not required to carry out their own housing needs assessment or take account of nationally derived local level need figures. For Bexley, the 10-year target is for 6,850 net new homes. Sites are allocated in this Plan to make sufficient provision for housing development for the London Plan 10-year target and the remainder of the Plan period. A full housing trajectory is set out at Table 41 in Annex C of this Local Plan.

1.16 A Plan-led approach, supported by key London Plan and local evidence, has been undertaken. It has identified future housing and economic needs and makes provision for these in the right locations across the borough. Economic growth, generating 10,000 net new jobs, has been identified over the Plan period. These jobs are across many sectors, including traditional industrial and logistics but also in construction, retail, education and healthcare. In line with the Local Plan vision and objectives, good growth will be secured by focussing new development in and around the borough's town centres; railway stations; other relatively well-connected areas. Development will also be located within designated industrial areas, making the most of Bexley's riverside location and industrial heritage. These factors have informed Bexley's local plan spatial strategy.

1.17 Bexley is an outer London borough, where the pattern of residential development has the potential for sensitive intensification over time. Bexley has two London Plan Opportunity Areas (OAs) within the Thames Estuary growth corridor. These are areas that have the potential to deliver a substantial amount of the new homes and/or jobs that London needs once the necessary infrastructure is in place. The Thamesmead and Abbey Wood OA is about to benefit from new transport infrastructure, including the Elizabeth Line to Abbey Wood. The Council has worked with the Mayor of London and Royal Borough of Greenwich to produce the recently adopted planning framework for the Thamesmead and Abbey Wood OA.

1.18 The Bexley Riverside OA is however unlikely to fulfil its development potential during the Plan period as it is dependent on infrastructure improvements that have not yet been committed. The Local Plan does identify growth opportunities in appropriate parts of the area but many of the Mayor's aspirations for Bexley Riverside OA that are set out in the London Plan will not be fully

realised in the Plan period. The Council will continue to work with the Greater London Authority, including Transport for London, to identify and develop opportunities and an early review of the Local Plan will be undertaken should circumstances change sufficiently to justify it.

SP1 Achieving sustainable development – the spatial strategy

Commitments for sustainable growth

1. The Council, through its policies and decisions, will aim to:
   a) positively pursue sustainable development in the borough by providing locally specific requirements in line with the NPPF and the London Plan; and
   b) achieve sustainable growth in homes, jobs and services to create a network of healthy, well-connected, high-quality, desirable places where people want to live, play, learn and work in line with the vision and objectives of the Council's key strategies and Local Plan, thus implementing the principles of sustainable development.

2. All new proposals for development must conform with the following principles of securing sustainable development in Bexley, where appropriate.
   a) Strengthen and diversify the local economy by:
      i. reinforcing the network of vibrant and successful town centres;
      ii. optimising the use of the borough's industrial land through intensification of sites;
      iii. increasing inward investment in new high technology and creative sectors supported by world-class digital infrastructure;
      iv. promoting circular economy principles and business models; and,
      v. improving access to jobs in Bexley, London and the wider south east through the development of local skills.
   b) Protect and enhance the natural and built environment by:
      i. adapting to and mitigating the impacts of climate change, including flood risk;
      ii. focussing new development on urban, brownfield sites in accessible locations; and,
      iii. optimising the efficient management of waste and existing natural resources.
   c) Create high-quality, safe and well-connected healthy lifetime communities by:
      i. offering a choice of accessible, living styles that appeal across generations; and
      ii. providing necessary infrastructure, local services, open spaces, and cultural and educational facilities.

Bexley's sustainable development locations

3. The parts of the borough best able to accommodate, at varying densities and amounts, the housing, industrial and commercial growth identified for Bexley, including most of its supporting infrastructure, services and facilities, are:
   a) the locations within the blue boundaries on the key diagram (Figure 1), which illustrate:
      i. areas within 800 metres walking distance of, and including, Bexley's main town centres and 400 metres from local town centres;
      ii. areas in the borough within 800 metres of railway stations that have a corresponding town centre nearby and 400 meters where the station has no adjacent town centre; and,
      iii. areas with public transport access levels (PTALs) of 3-6;
   b) designated industrial locations (specifically for industrial growth and intensification); and
   c) within the remainder of the Thamesmead and Abbey Wood London Plan Opportunity Area not covered in parts 3a or b.

4. Development proposals outside of these areas will only be supported where they demonstrably contribute to sustainable development, respect local character and are supported by the required infrastructure.

Key spatial diagram for Bexley

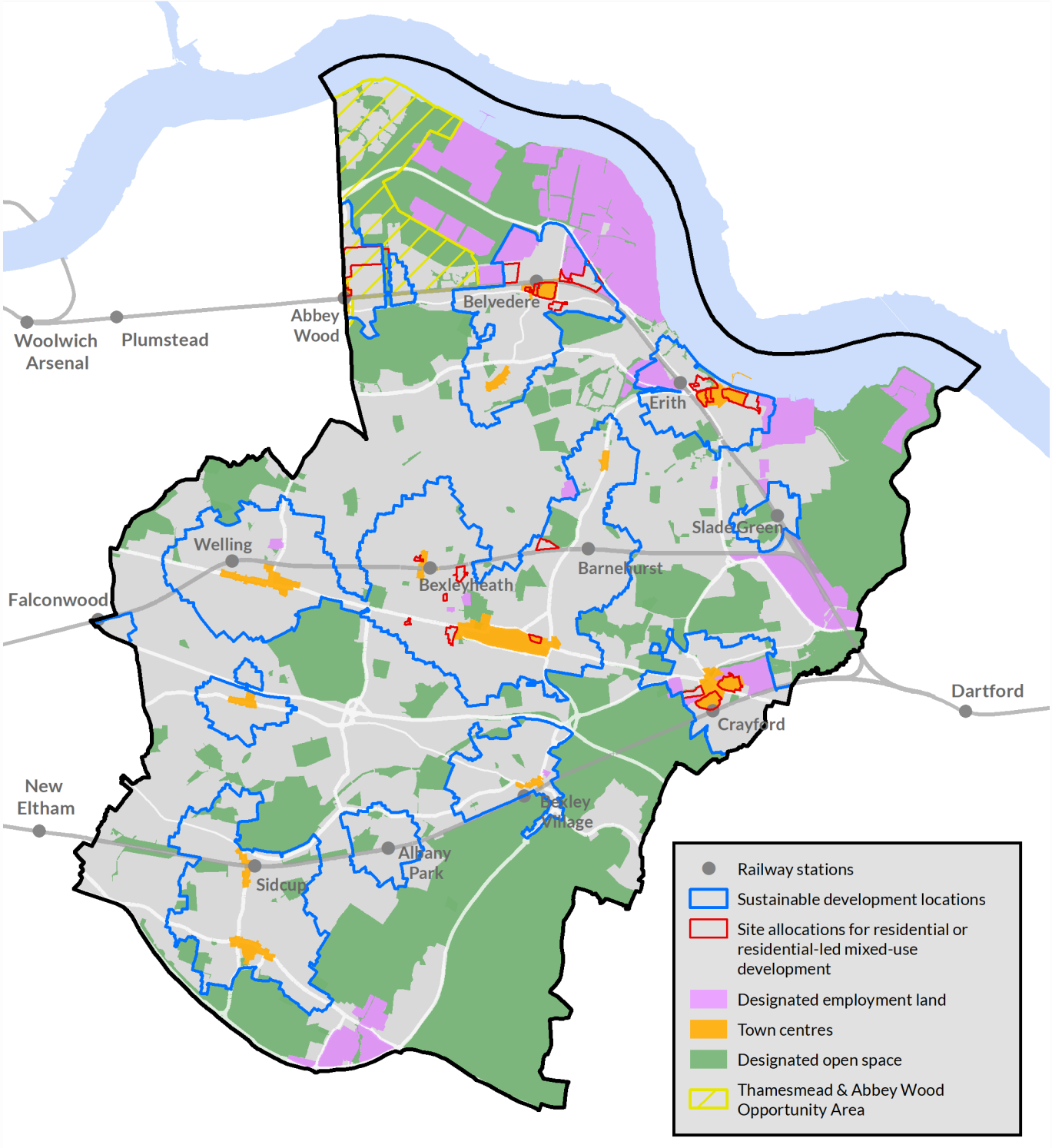


Figure 1: Spatial strategy for the local plan

Policy implementation

1.19 The principles of sustainable development are set out in the NPPF and the London Plan. The London Plan, which comprises strategic policies for all of London, is part of Bexley's Development Plan. There is scope in these documents for local evidence to provide the basis for local plan policies, both strategic and detailed in nature. Local plans are where a spatial strategy should be set out for a local planning authority area, demonstrating that local needs are being addressed.

1.20 Figure 1 (the key diagram) illustrates the Local Plan spatial strategy. Sustainable growth will be achieved by focussing new housing, including accompanying services and facilities and many of the new jobs, in and around the borough's main town centres and transport hubs. These are the borough's **sustainable development locations** and are referred to as such throughout this Local Plan. The sustainable development locations explicitly exclude designated Green Belt and Metropolitan Open Land (MOL) and any designated open spaces and residential amenity green spaces within the sustainable development locations are protected from development.

1.21 Designated green (and blue) infrastructure, including nature conservation areas and Green Belt, is protected from development; please refer to Local Plan and London Plan policies that address these areas. All statutory planning and related land-use designations or functions are defined on the submission policies map.

1.22 Bexley's contribution to London's economic growth will be achieved by intensification of the borough's town centres and designated industrial areas. These places are where most employment sectors will be located, although a significant number of new jobs in the borough will occur in residential areas, such as in schools, health and other community facilities, and in residential care.

1.23 Use Class E - Commercial, Business and Service, introduced in September 2020, broadly covers most town centre uses. The borough's town centres, both new and existing with updated boundaries, have the capacity to accommodate predicted growth in the commercial sector, and the flexible approach means that Bexley's town centres can adapt and thrive even in uncertain times. Town centres will play their part as the desired locations for many functions, including shops, community facilities and services, new employment opportunities and housing.

1.24 A review of Bexley's industrial land has been undertaken. Strategic Industrial Land (SIL) will be intensified where possible to optimise the use of this land for appropriate business uses, including waste facilities and wharves, safeguarded for their industrial purposes. Locally Significant Industrial Sites (LSIS) will also play their part as designated industrial locations. Most industrial uses in the borough are located within these designated areas – only around 7% of industrial businesses operate on non-designated industrial sites in Bexley.

1.25 Bexley has enough surplus designated industrial land to accommodate all existing industrial uses, including those on non-designated industrial sites, and for the planned growth in jobs for employment sectors that should be located within industrial areas. Nonetheless, a strategic approach of 'no net loss' of existing industrial floor space has been applied in the review and designation, or release, of industrial land. This allows redevelopment for residential use in the right locations, and also the redevelopment of non-designated industrial sites for residential use, as these are often smaller sites located within residential areas or around town centres. These are prime locations for new homes.

1.26 New high-quality, affordable and accessible housing, supported by expanded or new community services and facilities where needed, should be focussed within the identified sustainable development locations, as these areas already have the best access to public transport, good walking and cycling links, shops, and other services.

1.27 Many social and community services and facilities, such as schools, community centres and smaller health services, including GPs and dentists, are also appropriate within existing residential areas to provide walk-to services for the borough's residents, and therefore can be outside of the sustainable development locations if necessary.

1.28 The sustainable development locations across the north of the borough are focussed on Erith town centre and the railway stations of Belvedere and Abbey Wood with their new town centre designations, and to a lesser extent around the railway station at Slade Green. The large designated industrial areas in the north of the borough provide sustainable development locations for employment growth.

1.29 Belvedere and Erith can provide significant mixed-use development opportunities from identified large sites. Included in this approach is the release of a small amount of industrial land that sits closest to the new town centre at Belvedere Station – a key growth location for the borough. Growth can also be accommodated within the Thamesmead and Abbey Wood London Plan Opportunity Area, which has a recently adopted Planning Framework.

1.30 Sustainable development locations across the middle of the borough are focussed in and around Bexleyheath and Crayford town centres and areas with good access to public transport. These central areas provide significant residential or mixed-use development opportunities from identified large sites and good opportunities for housing on smaller sites. As well as Bexleyheath and Crayford, these locations spread out to Welling and Northumberland Heath, and the railway stations of Bexleyheath, Barnehurst and, to a lesser extent, Falconwood.

1.31 Sustainable development locations in the south of the borough are focussed on Sidcup town centre and its railway station (and accompanying local centre), the local centres of Blackfen and Bexley Village, and around the railway station at Albany Park. These areas will provide more modest growth from predominately smaller sites, around Sidcup Station and the town centre. The large designated industrial area in the south of the borough at Foots Cray provides a further sustainable development location for employment growth.

1.32 These locations across the borough are considered reasonably accessible, but without a step-change in public transport infrastructure by the Mayor, Transport for London and central Government, opportunities for significant growth will be constrained. It is therefore vital that growth is delivered in a way that meets the needs of Bexley's residents, whilst protecting the best elements of Bexley's character.

1.33 Where higher levels of infrastructure investment are confirmed, such as improvements to connectivity through the funding of strategic transport schemes, the Council will review this Local Plan in order to implement its longer-term vision for sustainable growth set out in the Bexley Growth Strategy.

Local Plan housing trajectory

1.34 Figure 2 sets out a summary housing trajectory for the Plan period. Bexley's London Plan 10-year housing target is 6,850. The first five years of the trajectory are met by the Council's published five-year housing land supply (2021/22 to 2025/26) and includes a 20% uplift in supply to meet the requirements set out in paragraph 73 of the NPPF.

1.35 The remainder of the Plan period is made up of the site allocations set out in Part 2 of this document and a small sites windfall allowance. For the Plan period beyond the London Plan period (e.g. after 2029), sites from later phases of the Mayor of London's 2017 strategic housing land availability assessment (2017 SHLAA) and local evidence of identified capacity have formed the basis of the site allocations and been used along with rolling forward the windfall allowance for small sites, in line with London Plan paragraph 4.1.11.

1.36 The housing trajectory will be kept under review and updated annually in the Local Plan Monitoring Report, linked to evidence from the Government's housing delivery test, and the Council's five-year housing land supply report. A detailed Local Plan housing trajectory is set out at Table 41 in Annex C of this Local Plan.

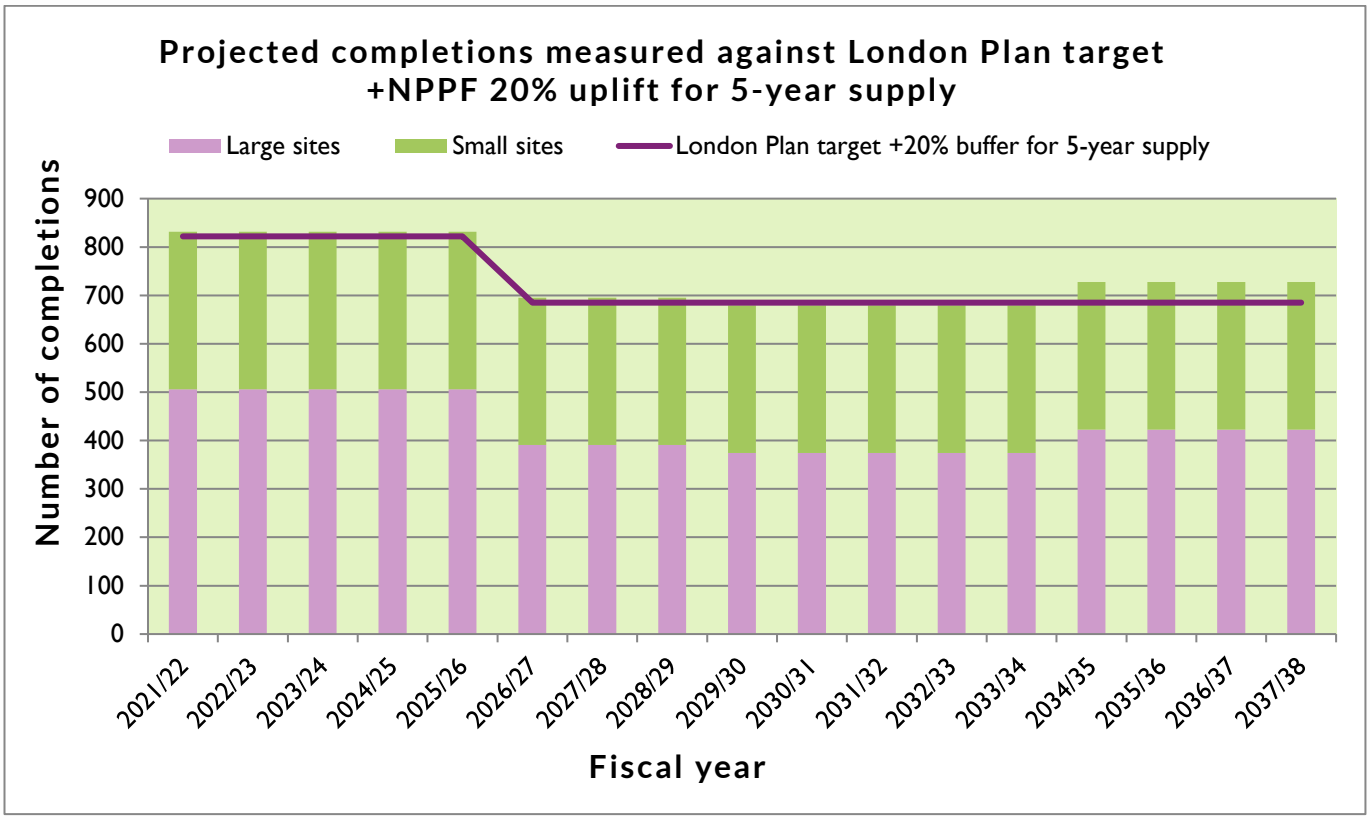


Figure 2: Bexley local plan housing trajectory for the Plan period (2021 - 2038) (net numbers of housing units)

1.37 Large sites (0.25ha and larger) make up 55% of Bexley's housing target. Large sites that are not already identified through the Council's five-year housing land supply are included in this Plan as site allocations for residential, and residential -led mixed-use development (see PART 2 of this local plan).

1.38 These have been drawn from Bexley's 2017 call for sites exercise; the GLA's 2017 SHLAA; and from engagement with landowners and developers. This includes three sites that have been released from industrial land use designations for primarily residential development, achieved through an industrial land review that is set out in the Employment Land Technical Paper and the Bexley Industrial Land Intensification Study.

1.39 Small sites (smaller than 0.25ha) make up 45% of Bexley's 10-year housing target, as set out in London Plan Table 4.2. Small sites are expressed as a windfall allowance in the housing trajectory, which is considered an appropriate approach in London.

1.40 However, a small sites exercise was carried out, using the sustainable development locations for areas of search, to ascertain a theoretical development capacity from small sites. It is considered that these small potential development sites, along with an uplift from sensitive intensification of housing in the same areas, provides the basis to meet the small sites component of the London Plan housing target for Bexley.

1.41 Further information to support the development of small sites, such as design codes, will be included in the Bexley Design Guide Supplementary Planning Document [the 'Design Guide SPD'].

2. Bexley's homes: promoting mixed and balanced communities

Related Council overarching strategies

Bexley Growth Strategy
Bexley Housing Strategy
Aging Well Strategy

2.1 This chapter sets out the strategic and non-strategic policies that seek to ensure housing provision meets the needs of Bexley's population and that housing types and tenures reflect local circumstances, whilst also contributing to the sustainable growth of London as a whole, taking account of the policies already in the London Plan.

2.2 There were an estimated 92,944 households in Bexley from the 2011 Census. There were over 101,000 households in 2019, and this is predicted to rise to almost 135,000 households by 2050. The average household size was 2.495 people at the 2011 Census.

2.3 The population of Bexley will change significantly over the next few decades. The north of the borough will see the highest amount of Bexley's growth and the whole borough will become more diverse. In addition, Bexley has an ageing population – the population aged over 75 will almost double by 2050. The younger population will also increase, but to a much smaller extent.

SP2: Meeting Bexley's housing requirements

Related plans, strategies and key evidence – why we need this policy

National Planning Policy Framework (NPPF)
London Plan (March 2021)
Bexley Housing Strategy
Bexley Strategic Housing Market Assessment (SHMA)
Bexley Gypsy And Traveller Accommodation Assessment (GTAA)
Bexley Self Build and Custom Housebuilding Register

2.4 Bexley is typified as an outer London borough dominated by predominately privately owned, inter-war, low density residential neighbourhoods. House prices in the borough have risen significantly in recent years and residents are experiencing affordability issues arising from the relationship between local incomes and house prices. Since 2011, Bexley's median house price has increased by 62% compared with wage increases of 5% meaning that the average house price is now ten times the average wage in Bexley, putting home ownership out of reach for many Bexley residents.

2.5 As a result of demographic change, Bexley is experiencing increased demand for homes, decreasing affordability, rising homelessness with its associated need for more temporary accommodation, as well as issues around providing suitable dwellings for particular groups such as for families, and for the elderly. Whilst the private rented sector meets the needs of many people and will play an increasingly important role over the Plan period, there are still those that will need to be supported through social rented housing stock. Without addressing these issues, it is likely that there will be continuing pressure for temporary accommodation, which is becoming an increasing financial burden for the Council to bear.

2.6 Therefore, as part of the delivery of new housing, the Council encourages the provision of homes that are affordable to local people. This means housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership

and/or is for essential local workers); and, which complies with one or more of the definitions of affordable housing set out in Annex 2 of the National Planning Policy Framework (NPPF). The NPPF also states that where a need for affordable housing is identified, planning policies should specify the type of affordable housing required.

2.7 The NPPF requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy. It sets out that these should include, but not be limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, people who rent their homes, people wishing to commission or build their own homes, and travellers.

2.8 In line with the footnote to paragraph 73 of the NPPF, any identified need for traveller accommodation is in addition to Bexley's overall housing target. The London Plan requires 10-year pitch targets for gypsy and travellers to be set out in local plans.

SP2 Meeting Bexley's housing requirements

The Council's commitments for mixed and balanced communities

1. The Council will seek to meet the Mayor's 10-year housing target for Bexley of 6,850 new homes. In this context, and reflecting local evidence for housing, it is the Council's aspiration to achieve 50% affordable housing as a proportion of all qualifying provision across the borough over the Plan period. This should be achieved with an overall tenure mix of 70% low cost rented and 30% intermediate housing products and with a mix of housing types and sizes identified in the Bexley Strategic Housing Market Assessment (SHMA) and set out in Table 3.

2. The Council will seek to accommodate the specific needs of particular groups of residents. The Bexley SHMA, the Gypsy and Traveller Accommodation Assessment (GTAA), and the Council's Self-build and Custom Housebuilding Register identify demand for the following housing numbers over the Plan period:

   a) 1,008 units of specialist older person accommodation (falling within Use Class C3);
   b) 43 units of residential care accommodation (falling within Use Class C2);
   c) 3.2 gypsy and traveller pitches (detailed in Table 4) based on a cultural definition of need; and
   d) 408 self-build homes (based the annualised figure from new entries on the Council's self-build register).

3. In order to create high-quality, safe and well-connected lifetime communities, which offer a choice of living styles that appeals across generations, new homes should be provided that are available to households across a range of incomes and sizes. To achieve this, the Council will:
   a) seek to deliver a balance of family and other types and sizes of housing within affordable and market housing schemes, as identified in the Bexley SHMA;
   b) work closely with registered providers to support the development of new homes and explore the potential for intensification of existing social housing land;
   c) consider sensitive residential intensification within the borough's identified sustainable development locations; and
   d) monitor the demand for self-build or custom build accommodation in the borough and plan accordingly.

Housing development on small sites

4. The Council recognises that the London Plan sets a significant proportion of Bexley's housing requirement to be met through the development of sites smaller than 0.25 hectares in size. Therefore, the Council will support proposals for appropriate development of small sites within the **sustainable development locations** set out in policy SP1, illustrated on the Local Plan key diagram (Figure 1) and defined on the submission policies map.

Local Plan housing mix

tenure / unit size	market	low cost rent	shared ownership/ intermediate rent	all tenures
1 bedroom	6.4%	18.1%	12.8%	11.5%
2 bedrooms	29.3%	59.9%	42.7%	42%
3 bedrooms	43.1%	17.1%	34%	32.7%
4 bedrooms	21.2%	4.9%	10.5%	13.9%
	100%	**100%**	**100%**	**100%**

Table 3: Sizes of homes needed, by tenure (source: Bexley SHMA)

Policy implementation

2.9 For the Plan period beyond the London Plan period (e.g. after 2029), sites from later phases of the Mayor of London's 2017 strategic housing land availability assessment (2017 SHLAA) and local evidence of identified capacity have formed the basis of the site allocations and been used along with rolling forward the windfall allowance for small sites, in line with London Plan paragraph 4.1.11.

2.10 The Bexley Housing Strategy sets out the Council's housing priorities over the next five years and how the Council will work with partners to deliver these. The Bexley SHMA has informed the affordable housing target for the borough. The affordable housing target is a borough-wide target for the whole of the Plan period secured from qualifying schemes. A qualifying scheme is any development proposal that includes 10 or more (gross) homes. Proposals can come from registered providers of intermediate and social housing, and from private schemes. Smaller developments (that are still qualifying schemes) could include payments-in-lieu where appropriate.

2.11 In order to consider an appropriate share of each type of affordable housing tenure, the Bexley SHMA considers London Plan and national policies, past trends in delivery, and the relative affordability of alternative tenure options. Household income is not available from the housing register, but CAMEO household income data and Household Survey data have been used to investigate the relative affordability of different tenure options.

2.12 Additional sub-categories setting locally specific requirements within the London Plan target are included where justified by evidence. The Bexley SHMA suggests that, for the elderly, the need in Bexley is overwhelmingly for specialist older persons housing (Use Class C3), which for clarity follows the same definitions set out in the Mayor's London Plan policy H13 and supporting text. There is exceptionally low demand for care homes and institutions in the borough and proposals for this type of housing will need to provide a robust demonstration of need by Bexley's residents.

2.13 Table 4.3 of the London Plan sets a benchmark figure for specialist older persons housing for Bexley of 145 units per annum. This figure is indicative only and is a component of Bexley's overall housing target, not an additional requirement. Bexley's local level assessment of specialist housing has identified a need of 70 units per annum, fewer than half the indicative London Plan figure.

2.14 The Bexley GTAA has considered the need for additional gypsy and traveller pitches over the Plan period, using the definition of need in the Planning policy for traveller sites (PPTS) and a 'cultural' definition of need. Gypsies and travellers are recognised as distinct ethnic minority groups in law

because they are recognised as members of communities with a shared history, culture and language stretching back over hundreds of years. As such they are granted the full protection of the Equality Act. Therefore, the cultural definition of need includes settled members of the community.

2.15 Table 4 sets out requirements for gypsy and traveller pitches over the Plan period. These levels of need will likely be met through the intensification or extension of existing sites in line with policy DP4. The Council will undertake further technical work closer to the time to ensure that this can be achieved on the existing Council site.

Pitch Need	Cultural need	PPTS need
Baseline 5-year pitch need (2017/18 to 2021/22): Surplus	**-2.7**	**-0.4**
Over period 2022/23 to 2026/27	3.3	0.4
Over period 2027/28 to 2031/32	0.0	0.0
10-year pitch requirement	**0.6**	**0.0**
Over period 2032/33 to 2036	2.5	0.3
TOTAL pitch need (figures may not sum due to rounding)	**3.2**	**0.4**

Table 4: Overall gypsy and traveller pitch need (source: Table 7.4 from Bexley GTAA Report)

2.16 The Council monitors both the demand and supply for self or custom-build accommodation. Whilst it is considered the polices in this Local Plan support self-build and custom housebuilding, the main constraint in London is a ready supply of appropriate land. Those interested in registering on the Self-build and Custom Housebuilding Register can do so on the Council's website.

2.17 Family housing is considered to be the type of housing in most demand across all tenures, as indicated by Table 3. Analysis from the Bexley SHMA has concluded that 44.6% of households in the borough are families. Modelling of affordable housing requirements suggests that a range of affordable dwellings are required that will help to address the needs of families.

2.18 Housing development on small sites above what is needed for self-build is a strategic London-wide requirement, in order to boost the supply of land for housing. The Council supports the appropriate development of small sites for new homes within the identified sustainable development locations as illustrated on the local plan key diagram (Figure 1).

2.19 Further information to support the development of small sites, such as design codes, will be included in the Design Guide SPD.

DP1: Providing a supply of housing

Related plans, strategies and key evidence – why we need this policy

Bexley Housing Strategy
Bexley Strategic Housing Market Assessment (SHMA)
Whole Plan Viability Assessment

2.20 Ensuring a supply of appropriate sustainably located housing is possibly the most important development need that should be addressed in a local plan, according to Government in its presumption in favour of sustainable development set out in the National Planning Policy Statement and planning practice guidance. A significant change in local housing need, for instance,

can trigger an early review of a local plan. In addition, the NPPF cites the provision of affordable housing first in its list of types of contributions expected from development.

2.21 In London, the Development Plan is formed in two tiers, with the Mayor's London Plan setting the broad, strategic policies for the whole of London, and each planning authority within London preparing local plans for their area. The NPPF states that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the Plan period.

2.22 This Local Plan addresses how Bexley will contribute to meeting London's housing need through its first two strategic policies, SP1 and SP2. Providing a supply of housing of the right types and in sustainable locations is addressed in this policy, justified by local and London Plan evidence.

2.23 It is important that new housing built in the borough is in the right locations and of the right types to ensure that what is built helps to meet the needs of residents.

2.24 Whilst historically much of the provision of hew homes in the borough comes from larger sites, the NPPF and the London Plan seek to encourage a greater number of homes to be provided on smaller sites (less than 0.25 hectares). This may however have an impact on the amount of affordable housing than can be secured through new development. Whilst some small sites do help to deliver affordable housing they are only required to do so if 10 or more homes are built on the site.

2.25 Interrogation of the Greater London Authority's development database has shown that since the beginning of the previous Local Plan period (2012), 22% of all housing provision in Bexley has come from developments that provide fewer than 10 homes each. Yet this residential development, close to a quarter of all homes built in the borough, is exempt by Government from making any affordable housing contribution. This has quite an impact on the delivery of affordable housing in the borough. By placing an emphasis on the development of smaller sites for new homes, there is a real risk that fewer units of affordable housing will be delivered.

2.26 With a decline in traditional social housing, the working model is that private sector development will generate general market affordability through supply and demand. However, there is still a place for planning policy to influence; there are real benefits to providing a mix of housing types and tenures because it allows for a choice in the market and is an effective way of bringing together local communities.

2.27 The private rented sector is playing an increasingly important role in meeting housing need in the borough and has the potential to meet the needs of those who chose not to or are unable to purchase their own home. Nonetheless there are still those that will need to be supported through social rented housing stock.

DP1 Providing a supply of housing

1. Development proposals for new housing should be in the parts of the borough identified as sustainable development locations set out in SP1, and must:
   a) be well designed, appropriate for the area, high quality, sustainable and take account of the impacts of cumulative development, including on the health and wellbeing of the borough's residents;
   b) make the most effective and efficient use of land, seeking to achieve higher densities in the most accessible locations;
   c) achieve all relevant space, accessibility, environmental, and housing amenity standards; and

DP1 Providing a supply of housing

d) encourage mixed communities through 'tenure blind' architecture.

Affordable housing from qualifying developments

2. For residential development proposals with a capacity of 10 or more (gross) dwellings, the Council will follow a threshold approach and seek 35% affordable housing on-site.

3. For all qualifying schemes, a mix of dwelling sizes and tenures, including family housing, will be sought in accordance with the Bexley SHMA, as set out in Table 3, in order to meet overall need throughout the Plan period.

4. Development proposals that do not meet the affordable housing threshold will be refused unless justified by a full, normally un-redacted viability assessment that is submitted at the same time that a planning application is submitted.

Self-build and Custom Housebuilding

5. Developers are encouraged to provide plots, where appropriate, within residential schemes for individuals or groups to build their own homes.

Policy implementation

2.28 The cumulative impacts of development will have a direct effect on capacity of existing services to support existing and new developments. This can include all types of infrastructure, from social and community facilities through to utilities, such as digital, energy, water and wastewater, and services such as collection of waste and street cleaning. Many service providers have planning guidance available for developers.

2.29 It is expected that the development capacity of sites will be optimised. Further information on density will be set out in the Design Guide SPD. The exact housing type and size mix on each site will vary according to the location of the development, the character of the surrounding area and the need to ensure an appropriate range of tenures in the locality.

Affordable housing

2.30 On schemes that qualify for affordable housing contributions, affordable housing should be provided on-site. Financial contributions will only be acceptable when on-site provision and all potential off-site options have been fully explored and discounted to the satisfaction of the Council. Further information with regards to affordable housing calculations will be provided in planning guidance, reflecting the Council's preference for on-site provision.

2.31 For the purposes of affordable housing, residential development is defined as development falling under Use Class C3. The percentage target mix for housing type and tenure has been set out in the Bexley SHMA. 'Low cost' rent includes the London affordable rent and social rent products; intermediate housing products include London Living Rent and London Shared Ownership.

2.32 The overall requirement for a 35% affordable housing contribution has been assessed for its viability and is the recommended policy approach to ensure that the maximum amount of affordable housing that can be delivered will be delivered. By applying a threshold approach for securing affordable housing, development proposals that provide 35% affordable housing and that meet tenure, affordability and other relevant requirements, can progress without the need to

submit detailed viability information and without late viability review mechanisms that re-assess viability at an advanced stage of the development process.

2.33 This approach provides greater certainty to the market, speeds up the planning process, helps to increase the level of affordable housing secured in new developments, as tested through the whole plan viability assessment. Schemes that do not provide the threshold level of affordable housing or meet other relevant policy criteria are subject to viability scrutiny and late, as well as early, review mechanisms.

2.34 Ensuring the transparency of a viability assessment is supported in the Mayor's Affordable Housing and Viability SPG. The assessment will be made publicly available and will be independently evaluated at the cost to the applicant. In very exceptional circumstances there may be legitimate reasons for keeping limited elements of viability information confidential. In this instance the developer is required to follow the guidance set out in the Mayor's Affordable Housing and Viability SPG.

2.35 The Council will use Existing Use Value Plus (EUV+) as the comparable Benchmark Land Value when assessing the viability of a proposal. An alternative approach should only be considered in exceptional circumstances which must be robustly justified by the applicant in line with the Mayor's Affordable Housing and Viability SPG.

2.36 The Council aims to maximise every opportunity to deliver affordable housing. Where housing schemes are approved on the basis of an affordable housing offer below policy requirements, there will be triggers set for when a viability re-appraisal of the scheme will occur. This will be when the scheme has been completed and largely occupied, or a mid-term review in the case of longer phased schemes, or for schemes that have not started within two years of being granted planning permission. Where viability has improved, the applicant will be expected to make further affordable housing provision up to the maximum policy requirement.

2.37 Whilst no demand has been identified in the borough, the Council will support proposals for new purpose built private rented sector accommodation where such schemes meet local need and requirements of the London Plan. Purpose built private rented schemes will be assessed under a specific viability approach that recognises the distinct economics of this sector.

➲ DP2: Residential development on backland and infill sites

Related plans, strategies and key evidence – why we ned this policy

The London Plan 2021 – Policy H2
Local Plan Spatial Strategy Technical Paper
Bexley Local Character Study
Bexley Green Infrastructure Study

2.38 The NPPF expects planning policies to ensure that developments 'create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users.' Supporting text to London Plan policy H2 states that residential development from small sites should generally be supported where they provide well-designed additional housing.

2.39 Small sites across the borough are subject to development pressures, with an average of 25% of new homes built in the borough coming from sites that are smaller than 0.25 hectares. Many of these sites deliver only a few units and some contribute to a supply for custom housebuilding and self-build developments. However, some small sites can deliver 10 or more homes and this level of

development would qualify for a contribution to affordable housing, a key priority of Government, the Mayor of London and the Council.

2.40 The Council carried out a development capacity exercise of small (less than 0.25ha) infill, back land and other sites in the sustainable development locations. The study searched for sites that had the capacity to deliver at least 10 homes and where the primary use of the site is not existing housing. This supply, when combined with the many sites that come forward each year with fewer units, demonstrates that the potential capacity is there to meet the small sites portion of Bexley's London Plan housing requirement. The supply is expressed as a small sites windfall allowance in the Local Plan housing trajectory.

2.41 Development on gardens, green spaces and other residential amenity spaces is only appropriate where certain criteria are met. The development of gardens does not fall under the 'previously developed land' category and this policy sets out requirements that development proposals will need to meet in order to demonstrate that in exceptional cases, building on a green or other amenity space can be achieved without adverse impacts.

2.42 Since the largest proportion of residential gardens in the borough consist of soft landscaping with lawns, mature trees and shrubs and flower beds, they have important environmental benefits. Similarly, public, communal or semi-private amenity spaces make important contributions to quality of life and the environment. Many gardens and communal amenity spaces in the borough combine with adjacent gardens to form green corridors.

2.43 Back gardens offer an environment relatively free of vehicles and their associated noise and pollution, and thus make an important contribution to the quality of life in the borough, both in terms of their amenity and recreational value and outlook, and in terms of their ecological function. Development proposals that include these spaces could lead to a substantial loss of amenity for the residents of existing dwellings in the vicinity and the character of an area adversely affected.

DP2 Residential development on backland and infill sites

1. Proposals for new dwellings on small (less than 0.25ha) brownfield sites, including infill and backland sites, will generally be supported where:
   a) the site is located within a sustainable development location as identified on the key diagram (Figure 1);
   b) the development capacity of the site is optimised; and,
   c) the development provides well-designed housing with a high standard of amenity that makes a positive contribution to the area.

2. Proposals for development on residential gardens and/or communal amenity spaces will be resisted, except where:
   a) adequate and safe access for vehicles and pedestrians is provided, with no adverse effects on the access to adjacent dwellings
   b) there are no adverse effects on the privacy and amenity of residents of neighbouring properties;
   c) distinctive landscape and nature conservation features, such as trees, hedgerows, and ponds, are retained; and,
   d) the proposed and existing dwellings retain sufficient private and, if appropriate, communal amenity space.

Policy implementation

2.44 The redevelopment of brownfield sites within the built environment can make a positive contribution to the street scene, as well as providing other benefits of the development itself.

Redevelopment or extensions of existing non-residential or mixed-use buildings and their service yard areas or blocks of residential garages are examples of brownfield sites where this results in net additional housing provision.

2.45 Infill and back land development can provide an important source of new homes, but only where these sites meet certain criteria that ensures the protection of environmental features and an acceptable level of amenity for adjacent and future residents. The character of an area can be adversely affected by infill, back land and similar developments both individually and cumulatively. Proposals will need to demonstrate that the development of these sites will not lead to a substantial loss of amenity for the residents of existing dwellings in the vicinity. Proposals for development on small sites should follow the guidance in the Mayor's SPG on housing and design and further information will be set out in the Design Guide SPD.

2.46 In addition, new homes can also be delivered through sensitive intensification. This would likely happen through a combination of extensions, alterations and conversions to existing homes to create additional units. The Design Guide SPD will provide detailed requirements for residential intensification and further information can be found in the Bexley Local Character Study.

2.47 In line with Policy SP8 part 1.c, harmful development on gardens will be resisted, unless the criteria set out in this policy are met. This applies to proposals within residential gardens, communal amenity space associated with flats (whether publicly accessible, semi-private, or private), and all other front, side or back, and/or incidental open space in primarily residential areas that, if development were permitted, could lead to a substantial loss of amenity.

2.48 Each development proposal will be considered on a site by site basis with regards to the criteria in this policy and all other relevant policies. The principles of the urban greening factor (UGF) in the London Plan should be adhered to in major developments, including it at the start of the design process.

➲ DP3: Providing housing for older people

Related plans, strategies and key evidence – why we need this policy

Bexley Housing Strategy
Aging well strategy
Bexley Strategic Housing Market Assessment (SHMA)

2.49 The population of older residents in Bexley is expected to increase, for example over 65s by 40% by the end of the Plan period. Bexley's Housing Strategy and the Bexley SHMA demonstrate a need to diversify the range of older persons' housing provision, whilst many older people want to stay in their own homes there will be a need for specialised housing for older people.

2.50 This policy ensures that where this specialist housing is provided, it is of the best quality and in the right location to meet Bexley's identified needs. Widening the choice in alternative housing options for older people could help to free up larger homes for families whilst ensuring that the specific needs of Bexley's older residents are met.

2.51 The needs of older people are changing. Changing aspirations and longer life expectancy means that different levels of care are needed, whilst also ensuring that people can stay independent for as long as possible. The need for specialised provision in a safe, supportive environment is increasing, reflecting the rise in the number of people who live with dementia and other debilitating conditions.

2.52 Further details for supporting older people are set out on the Council's website.

DP3 Providing housing for older people

1. Proposals for new specialist housing for older people will be supported where:
   a) there is an identified need in the borough for the tenure and type of accommodation proposed;
   b) standards of HAPPI have been considered, and implemented where appropriate, to ensure the scheme is suitable for the intended occupants; and
   c) the scheme is sustainably located near public transport, shops, local services, community facilities and social networks for residents, carers and visitors.
2. Proposals for residential care establishments that fall under Use Class C2 will need to demonstrate that they would provide levels of care as defined in Article 2 of the Town and Country Planning (Use Classes) Order 1987 or any subsequent amendments.
3. Any loss of specialist housing for older people will be resisted except where the applicant can demonstrate that there is no longer an established need in the borough.
4. Specialist housing for older people will be expected to provide an affordable housing contribution in line with policy requirements.

Policy implementation

2.53 Affordable housing contributions from specialist housing for older people will be applied according to London Plan requirements and it should be noted that this does not apply to care home accommodation. The London Plan has further detail in policy H13 with regards to care home accommodation exemptions.

2.54 HAPPI (Housing our Aging Population: Panel for Innovation) design principles should be considered when designing specialist housing for older people. Further details can be found on the Housing Learning and Improvement Network (Housing LIN) website.

2.55 Specialist housing for older people, including those with shared facilities, will be required to provide affordable housing where the accommodation is arranged as separate dwellings rather than care homes or institutions. A dwelling is a self-contained unit with a lockable front door that has its own bathroom and kitchen. Each self-contained unit should be counted as a dwelling for the purposes of calculating affordable housing provision. In the case of care homes or institutions, a mix of tenures will be encouraged.

➲ DP4: Gypsy and traveller accommodation

Related plans, strategies and key evidence – why we need this policy

Gypsy and Traveller Accommodation Needs Assessment (GTAA)

2.56 National planning policy instructs local planning authorities to set criteria to provide a basis for decisions on applications for traveller accommodation. In addition, the London Plan requires boroughs to actively plan for gypsies and travellers' accommodation needs, and to protect existing gypsy and traveller accommodation capacity.

DP4 Gypsy and traveller accommodation

1. Bexley's existing provision for gypsies and travellers, listed below and defined on the submission policies map, will be protected, while demand exists.

2. The following considerations should be taken into account in the determination of locations for future gypsies and travellers' sites:
   a) complying with the requirements of other relevant policies, including policies that seek to protect designated areas, such as metropolitan green belt, from inappropriate development;
   b) avoiding areas of flood risk (Environment Agency Flood Zones 2 and 3); and
   c) ensuring there are no significant adverse impacts on the locality including:
      i. the character and appearance of the site and surrounding area;
      ii. the residential amenity of neighbouring properties; and
      iii. the local highway network.

3. Any proposal for a new site, or intensification of an existing site, should:
   a) provide suitable access to local services and facilities and public transport links; and,
   b) be of suitable environmental quality (such as noise and air quality) to not unduly affect the amenity and health and wellbeing of potential residents.

4. Proposed improvements to existing pitches and sites will be supported, where appropriate.

Policy implementation

2.57 Policy SP2 sets out the identified need for additional gypsy and traveller pitches, evidenced by the Bexley Gypsy and Traveller Accommodation Needs Assessment.

2.58 There are three sites shown on the submission policies map designated for traveller accommodation. These are the Council's site at Powerscroft Road and two private sites at Jenningtree Way and Willow Walk.

2.59 Availability of government grant will be explored to assist with the maintenance and, where necessary, delivery of gypsy and traveller sites. Improvements could be delivered through site intensification.

➲ DP5: Houses in multiple occupation and live/work units

Related plans, strategies and key evidence – why we need this policy

Bexley Strategic Housing Market Assessment (SHMA)
Article 4 Direction providing additional planning control of HMOs

2.60 A house in multiple occupation (HMO) is defined in planning legislation as a house or flat occupied by a certain number of unrelated individuals who share basic amenities such as a kitchen and bathroom. HMOs are an important source of lower cost housing within the private rented sector, but a number of them clustered in any one area can have an adverse impact on local amenity.

2.61 Large HMOs need to be licenced and the Council publishes the register of licences granted. The Council has extended control of HMOs to ensure they provide suitable accommodation. This includes a licensing regime for smaller HMOs, and the introduction of additional planning controls through an Article 4 Direction, which came into force on 24 September 2017.

2.62 The Direction relates to development comprising of a change of use from a use falling within Class C3 (dwelling house) of the Town and Country Planning (Use Classes) Order 1987 (as amended) to a

use falling within Class C4 (house in multiple occupation) of that Order and removes Permitted Development rights for this type of development. Planning permission will, therefore, be required for change of use from Class C3 to Class C4. The Article 4 Direction applies to the whole of the London Borough of Bexley.

2.63 Providing local policy requirements for live/work units is important to ensure that the standard of accommodation meets the usual requirements for normal residential dwellings.

DP5 Requirements for HMOs and live/work units

1. Development proposals for new houses of multiple occupation (HMOs) and non-self-contained live/work units (considered, and assessed, as HMOs) will be supported subject to:
   a) demonstrating they will not have an adverse impact on the local area; and
   b) the appropriate quality of the accommodation being proposed.

2. Self-contained live/work units will be expected to meet all living and space standards for C3 residential accommodation.

Policy implementation

2.64 HMO Legislation can be found in the published Management of Houses in Multiple Occupation (England) Regulations 2006 and the Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007.

2.65 When assessing the impact and quality of the proposed HMO on the local area, issues such as highway safety, residential amenity of future and neighbouring occupiers, refuse arrangements, Bexley's HMO Living and minimum space standards and the Rent it Right Scheme will be considered. This policy may also consider the communal Collective Living concept, subject to evidence. Non-self-contained live/work units will be considered, and assessed, as HMOs.

2.66 A self-contained live/work unit is defined as a single unit (e.g. studio or one bedroom) consisting of both a commercial and a residential component that is occupied by the same resident (composite E(g)/C3 use). The live/work unit shall be the primary dwelling of the occupant.

2.67 Self-contained live/work units must meet space standards for C3 accommodation, which are set out in the Mayor's Housing SPG and nationally described space standards.

2.68 Consideration will be given as to whether planning conditions are applied that seek to secure a continuing ratio between workspace and living space. In addition, the Council will consider the use of planning conditions to prevent sub-division and to restrict residential occupation to those employed in the linked workspace.

➲ DP6: Loss of existing housing

Related plans, strategies and key evidence – why we need this policy

Bexley Strategic Housing Market Assessment (SHMA)

2.69 The contribution of new dwellings and conversions to meeting the borough's housing need will be compromised if the existing stock or sites identified for residential development are used for other purposes without replacement.

DP6 Loss of existing housing

1. Development resulting in the net loss of all or part of a dwelling will generally be resisted, except where:
   a) it would replace a ground floor residential unit within a town centre with a ground floor main town centre use;
   b) it would replace significantly substandard units with fewer, high-quality units; or
   c) the loss would allow for the provision of a community facility that is suitable for residential areas, subject to no significant adverse impacts on neighbouring properties.
2. The loss of housing units through estate regeneration may be considered acceptable where the overall amount of affordable floorspace or habitable rooms is retained or, ideally, increased.
3. Proposals to return vacant homes back into use will be supported.

Policy implementation

2.70 Residential units within town centres should be located above ground level where possible to allow for more 'active' main town centre uses at ground level. It would be appropriate for access doorways and entrances to be located at ground floor level for accommodation above.

2.71 A significantly substandard dwelling is determined by having regard to the following; current space, layout, ceiling height or amenity standards as set out in local or regional guidance and cannot be reconfigured to do so. A high-quality dwelling is one that meets these standards as a minimum and exceeds them where possible. What constitutes an acceptable number of substandard dwellings to be lost and replaced with higher quality dwellings will be considered on a case by case basis.

2.72 Where estate regeneration schemes would lead to an overall loss of housing units, this may be allowed if smaller units are being replaced with much needed affordable family housing. In addition, the overall amount of affordable floorspace or habitable rooms should be retained or, ideally, increased. These benefits will be considered carefully against any overall loss of housing units, on a case by case basis. This can be within the scheme or potentially as part of a wider programme, provided the overall amount of affordable housing is not reduced within the borough.

3. Bexley's economy: strengthening our prosperity

Related Council overarching strategies

#BrilliantBexley
Bexley Growth Strategy
Town Centres Strategy
Learning, Skills and Employment Strategy
Start Well, Live Well and Age Well
Local Implementation Plan

3.1 Bexley expects to play an important role in London's future economy and making London a resilient city and build back better. This chapter sets out the strategic and non-strategic policies that help ensure growth is sustainable and dealt with in a coordinated manner, taking account of the policies already in the London Plan. A variety of matters are addressed, such as protecting designated industrial land in the borough for employment uses, promoting the circular economy model, and supporting increased diversity of the local employment offer and an improvement to workforce skills.

3.2 Bexley has an established industrial land base, and a well-performing town centre network. Local plan policies are needed to support the continued prosperity and development of these employment locations. It is essential that enough employment land is set aside to accommodate job growth. There is a need to stimulate land-use intensification in employment locations and in and around the borough's town centres. This ensures the most viable and sustainable areas remain the focus for future economic development.

3.3 The vitality and viability of the borough's town and neighbourhood centres will not just rely on growth; it will also depend upon adapting easily to changes in national retail and leisure trends. Policies in this chapter set out a more flexible approach to uses in town centres to ensure they remain strong and successful over the Plan period.

➲ SP3: Employment growth, innovation and enterprise

Related plans, strategies and key evidence – why we need this policy

Industrial Land Intensification Study
Employment Land Technical Paper
Employment Land Review Update

3.4 Currently, the borough's employment land is mainly connected to traditional industrial activities, particularly in respect of some larger employment sites that help to facilitate Bexley's regional role in sectors like logistics, recycling and waste management, and also support niche strengths such as food processing. These employment sites, some of which have safeguarded wharves, are often located within Bexley's London Plan Opportunity Areas. However, some existing employment areas and sites are not well suited to the needs of modern business, as they suffer from poor public realm and ageing infrastructure.

3.5 The borough is therefore well positioned to encourage businesses to transition from a linear economy model, where resources are transformed into products that are then disposed of, to a circular economy model. The World Economic Forum defines this as an industrial system that replaces the end of life concept with restoration and aims for the elimination of waste through the superior design of materials, products, systems and business models. Development proposals that

adopt the design principles of the circular economy for building approaches are supported by the Mayor of London.

SP3 Employment growth, innovation and enterprise

1. Bexley will continue to play a key role in contributing to London's economic growth and prosperity. The Council will support the economic growth of at least 10,000 new jobs over the Plan period. The Council will assist in developing a strong and sustainable local economy by embedding circular economy principles, so as to contribute to the resilience of London and the regeneration of the Thames Gateway. The Council will work with partners to secure investment that supports the local economy.

2. The Council will promote sustained economic development and employment growth by supporting development proposals that broaden the mix of business uses and diversify the local employment offer, particularly in bringing higher quality and more knowledge based jobs to the borough, both within town centres such as Bexleyheath, and designated industrial locations, and through the designation of Sidcup as a Creative Enterprise Zone. Proposals for economic development should, where possible:
   a) intensify land-uses to optimise the use of land, particularly on those sites identified in Table 7;
   b) increase employment densities;
   c) provide higher employment densities in well-connected locations;
   d) enable businesses to share facilities and equipment where practical, for example goods lifts, loading bays and ancillary facilities;
   e) make smaller units available as part of larger developments to support small and medium businesses;
   f) improve the quality of employment areas and town centres, including the public realm, to make them more suitable and attractive locations for modern businesses; and,
   g) apply circular economy design principles for building approaches.

3. Designated strategic industrial locations (SIL) and locally significant industrial sites (LSIS) will be protected for industrial type activities and related functions, including ancillary facilities, specific to their designation in the hierarchy, as set out in policy *DP7 Appropriate uses within designated industrial areas.* These designations are defined on the submission policies map.

4. The Council aims to ensure that residents of all abilities are provided with opportunities to access training and a variety of local jobs and enable local businesses to draw upon a wide range of skilled workers and employment premises. Key to this will be a better integrated and enhanced public transport network connecting Bexley's housing and employment locations. The Council will achieve these aims by:
   a) reducing residents' need to travel long distances by supporting the creation of a diverse local economy that offers a wide range of well-connected local job opportunities, particularly in Bexley's designated industrial locations, town centres, neighbourhood parades and other places of employment including education and healthcare;
   b) improving the local skills base, especially by ensuring that education and training facilities, are available to residents, and by supporting the development of place and making initiatives in the borough;
   c) encouraging businesses and developers, through planning obligations, to use locally sourced labour and where viable, to provide apprenticeships and on-the-job training for residents seeking to improve their skills
   d) supporting the provision of workplace crèches at or near places of training and employment; and,
   e) facilitating growth of the visitor economy and creative industries to support local business, particularly by promoting the borough's historic, cultural, recreational and environmental assets.

Policy implementation

3.6 This strategic policy provides a mechanism for the Council to proactively evolve its offer of business premises, such that it can attract the most beneficial mix of modern employers, including those of emerging growth and creative sectors and small and medium enterprises.

3.7 Designated industrial locations and town centres are shown on the submission policies map. To encourage commercial, business and service growth and investment, the intensification and modernisation of premises and sites within town centres and designated industrial locations to meet expected future business needs is necessary. The Council will only accept schemes that have provided robust evidence that the development proposal optimises the site and applicants must set out the options explored for intensification in their Planning Statements. This will contribute to the provision of modern high-quality business accommodation and improve the effectiveness of the employment offer, creating a diversity of jobs and improved skills levels.

3.8 Improvements to town centres and designated industrial locations should include more sustainably designed buildings and sites, where the benefits add appeal to prospective tenants and allow businesses to grow. Development proposals should not compromise the integrity or effectiveness of designated industrial locations to accommodate employment in accordance with the agent of change principle set out in paragraph 182 of the National Planning Policy Framework (NPPF).

3.9 The Council will support education and training to improve the local skills base. This policy supports the development of place and making initiatives in the borough, to facilitate education and training across all aspects of the built environment.

➲ DP7: Appropriate uses within designated industrial areas

Related plans, strategies and key evidence – why we need this policy

Industrial Land Intensification Study
Employment Land Technical Paper
Employment Land Review Update
Article 4 Directions Technical Paper

3.10 This policy ensures that industrial floor space capacity is appropriately managed across the borough. The potential for industrial intensification has been identified on designated industrial sites in order to free up land for much needed housing and supporting infrastructure. Industrial land consolidation has been carried out as part of a strategically coordinated process that is integral to the development of this Local Plan.

3.11 A review of Bexley's industrial land has been undertaken. Bexley's primary and secondary employment land as identified on the 2004 Unitary Development Plan Proposals Map, has been assessed. The Bexley Core Strategy 2012 and London Plan 2016 both identified a managed release of approximately 50 hectares of designated industrial land in the borough over the Plan periods of both those documents and this process was underway when reviews of the Local Plan and the London Plan began in 2017.

3.12 Working with the GLA, a baseline position of remaining industrial land in the borough has been determined. With a starting position of the designated employment land set out in the 2004 UDP and defined on the UPD Proposals Map, all employment land with planning consents that changed the use of the site up to and including 31 March 2017 have had the industrial designation changed to the consented use, unless the planning decision included a condition for the site to revert to employment use if the consented use ceased. The date of 31 March 2017 has been used as it is the baseline date for much of the technical evidence supporting the reviews of the London Plan and the Bexley Local Plan.

3.13 An audit has been carried out and the amount of existing industrial floor space and operational yard space determined. The role and function of industrial sites and areas have been analysed and industrial designations (e.g. strategic, of local significance, or undesignated) reviewed. Table 5 summarises the changes to designated industrial land, and Figure 3 maps these locations.

Bexley's designated industrial land

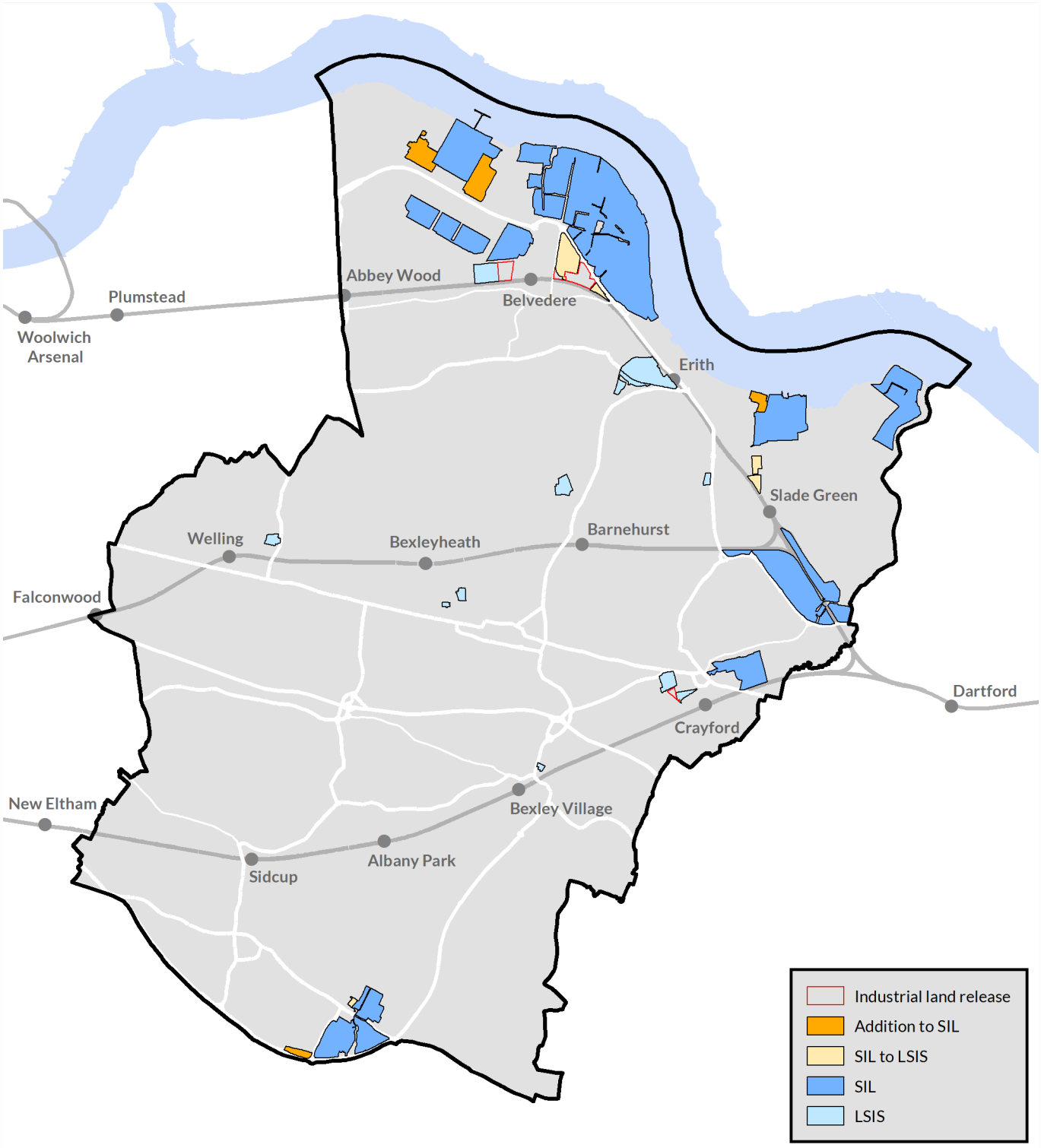


Figure 3: Industrial land baseline, illustrating land for release, SIL additions, and changes in the hierarchy from SIL to LSIS

Industrial land: baseline, additions and release and notation on Figure 2	Area in hectares
Industrial land baseline (SIL and LSIS) (Areas in blue and yellow on Figure 3)	414.27
Baseline industrial sites recategorised from SIL to LSIS	14.61
New designations of SIL (Areas in orange on Figure 3)	24.45
SIL/LSIS released for other uses (see Table 5) (Areas with red line boundaries on Figure 3)	9.84
Total designated industrial land (SIL/LSIS)	**428.87**

Table 5: Changes to designated industrial land

3.14 Strategic Industrial Land (SIL) will be intensified where possible to optimise the use of this land for appropriate business uses, including waste facilities and wharves, safeguarded for their industrial purposes. In some cases, land without a formal land-use designation has been allocated to SIL, to rationalise industrial processes already happening on the sites or to capitalise on a site's ability to provide additional industrial land in a location that would be highly suitable. Existing uses however will not be affected by this change to the land use designation.

3.15 Locally Significant Industrial Sites (LSIS) will also play their part as designated industrial locations. Most industrial uses in the borough are located within these designated areas – only around 7% of industrial businesses operate on non-designated industrial sites in Bexley.

3.16 Bexley has enough surplus designated industrial land to accommodate all existing industrial uses, including those on non-designated industrial sites, and for the planned growth in jobs for employment sectors that should be located within industrial areas. Nonetheless, a strategic approach of 'no net loss' of existing industrial floor space has been applied in the review and designation, or release, of industrial land.

3.17 The Employment Land Technical Paper and Industrial Land Intensification Study have provided the evidence for the release of designated employment land through the assessment of sites, and the setting out of considerations to guide future uses on the released sites. The existing floor space capacity and operational area of industrial sites that have been released to other land uses totals 51,380m2 with the capacity provided on sites in designated strategic industrial locations identified as having good potential for intensification. Table 6 summarises the floor space of the released sites and Table 7 sets out the sites with intensification potential. Detailed boundaries of designated industrial land are set out on the submission policies map.

Industrial site	existing industrial floor space (GEA) (m^2)	existing external operational area (GEA) (m^2)	new land use designation
Crabtree Manorway South (part)	15,980	27,210	Primarily residential
Monarch Works, Station Road North	3,650	2,300	Primarily residential
Belvedere Gas Holders (surplus utility site)	0	0	Primarily residential

Industrial site	existing industrial floor space (GEA) (m^2)	existing external operational area (GEA) (m^2)	new land use designation
Former Electrobase site (area within Crayford Meadows)	0	0	Urban Open Space/ SINC
total (net) floor space and operational land released	**21,870**	**29,510**	

Table 6: Industrial sites released for other land use designations

Strategic industrial location	Net floor space intensification potential (GEA) (m^2)
Outer Belvedere Industrial Area	113,500
Manor Road Industrial Area	58,900
Thames Road Industrial Area, Crayford	16,000
Foots Cray Business Area	9,000
total (net) floor space capacity from intensification areas	**197,400**

Table 7: Viable intensification opportunities in designated industrial land

3.18 The Industrial Land Intensification Study identifies a potential increase in capacity. Sites within four SIL that have been identified as being viable for intensification are set out in Table 7. Within these sub-areas, sites with particularly high potential for increase in industrial capacity are the undeveloped parcels at Veridion Park in the outer Belvedere Industrial Area and a large vacant site within the Thames Road Industrial Area.

3.19 Much of Bexley's designated industrial land is located along the River Thames in the north and River Cray in the east, and falls within the Bexley Riverside Opportunity Area (a London Plan designation). A planning framework prepared for the OA could provide further detail and guidance for land released for other uses, and for land remaining in industrial use.

DP7 Appropriate uses within designated industrial areas

1. Two types of industrial land are designated in the borough:
   a) Strategic Industrial Locations (SIL); and
   b) Locally Significant Industrial Sites (LSIS).

2. In designated Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), as identified on the submission policies map, the following uses for industrial type activities and related functions, including ancillary facilities, will be permitted and safeguarded:
   a) Class B2 and B8
   b) Class E(g)iii, only where the permitted function cannot change to any other E Use Class

3. Within SIL, proposals for sui generis industrial uses, such as for waste management and disposal installations or utilities functions, will usually be permitted within SIL, provided that the use does not impede the effective operation of other nearby businesses in the SIL or the primary function of the SIL as a business area. These uses are not considered an appropriate use within LSIS.

DP7 Appropriate uses within designated industrial areas

4. In designated industrial locations, development proposals should seek to intensify, renew and modernise business uses, including the assembly of land to achieve this.

5. Development proposals should not result in a net loss of existing industrial floor space for Class E(g)(iii), B2 and B8 uses in all designated industrial locations. Co-location with non-industrial uses will be considered on LSIS provided the principle of no net loss of existing industrial floor space is achieved.

6. Non-designated industrial sites should be assessed in line with criteria set out in London Plan policies, particularly E4 and E7

7. The SIL at Crossness Sewage Treatment Works is safeguarded for its strategic utilities infrastructure use and its operational area identified on the submission policies map.

8. In the Foots Cray Business Area, development proposals for existing E(g)(i) offices will only be permitted to change use to other suitable business uses (where not covered by permitted development rights).

Non-conforming uses

9. Extensions, alterations, intensification or any other form of development for existing non-industrial uses on designated industrial land will not be supported.

Temporary uses

10. The Council will support the temporary occupation of empty buildings and cleared sites by temporary uses for a maximum of three years that shall not be renewed, where they contribute to regeneration; enhance the character and vitality of the area; and, where they do not harm the operation of the remainder of the estate.

Policy implementation

3.20 The updated industrial land designations including changes to the hierarchy are defined on the submission policies map. For clarity and consistency, the London Plan designation notations of strategic industrial locations (SIL) and locally significant industrial sites (LSIS) are being used in the Local Plan and submission policies map in place of the terms primary employment areas and secondary employment areas, previously used in the Core Strategy and UDP.

3.21 Notwithstanding the above uses, in designated industrial locations where non-B-Class operations are already in existence, proposals should seek to provide B-Class operations. Proposals involving a quantum of floor space to be used for display and sales should demonstrate that those uses are clearly ancillary to a primary Class B use. Small-scale walk-to services, such as a workplace crèche or café, which meet the essential day-to-day needs of industrial occupiers in the SIL or LSIS, will generally be permitted, provided that the proposed use is necessary to support functioning industrial activity and it would not adversely affect the industrial status or operation of the area.

3.22 A detailed approach to optimising sites, including criteria for sites considered to be suitable for multi-storey industrial typologies are included in the Industrial Land Intensification Study and will be set out in the Design Guide SPD. The baseline and methodology for this approach are set out in the Industrial Land Intensification Study.

3.23 Sui generis uses (uses that do not fall into a use category prescribed by the Use Classes Order 1987, as amended) that are complimentary to industrial uses will be considered on their individual merits having regard to the objectives and policies for each area and the appropriateness of the

use in each location. Proposals for waste management and disposal installations will usually be permitted, provided that the use does not impede the effective operation of other nearby businesses in the SIL or the primary function of the SIL as a business area. These would not be considered appropriate in LSIS.

3.24 The Council will monitor the number of changes of use of business and commercial units which fall under Class E to Class C3 (residential) to understand the loss of such units and the impact on the borough's longer term ability to meet the need for employment floorspace. Should the need rise to safeguard the provision of units within these key industrial sites, the Council will explore additional measures to provide protection for these designated areas. This includes the introduction of an 'Article 4 Direction.'

3.25 A concentration of large office premises in the Foots Cray Business Area (designated strategic industrial land) is evidence of a healthy and well-functioning office market that has been identified in this location, commanding the highest office rental values in the borough, reflecting the area's good road links and supply of purpose-built premises of good quality. Where a proposal to change use is not covered by permitted development rights, the Council would only support the loss of office space where it would change use to another employment use suitable for being located on strategic industrial land. The Council is considering the use of an Article 4 Direction in the Foots Cray Business Area that would remove the permitted development rights for offices to convert to residential use.

3.26 Non-conforming uses prevent the opportunity to maximise industrial capacity within SIL/LSIS and potentially cause harm to appropriate uses through the agent of change principle. To ensure an appropriate balance of employment uses, the Council will restrict further expansion of retail floor space in designated industrial locations to instances only where the use is demonstrated to be ancillary to a primary Class B use.

➲ DP8: Telecommunications and digital infrastructure

Related plans, strategies and key evidence – why we need this policy

Bexley Local Character Study

3.27 The Council supports the expansion of high-quality, reliable electronic communication networks, including telecommunications and high-speed broadband, and will facilitate the expansion of this technology as it is key to economic growth. And, as the world goes increasingly online, it will be essential that no one gets left behind. Digital technology allows residents to access local community facilities and services.

3.28 Some types of digital infrastructure, in particular data centres, are most appropriately located in the borough's strategic industrial locations. Other elements of the telecommunications network will need to be located throughout the borough in order to achieve full digital connectivity.

3.29 However, it must also be recognised that telecommunications equipment can be very intrusive in the environment and the overall number of masts and sites should be limited to only what is necessary for operational needs, including future capacity linked to the planned growth in the borough. It will, therefore, be necessary to balance the need for such equipment with the need to protect the character and appearance of the area, particularly in certain sensitive areas.

DP8 Telecommunications and digital infrastructure

1. Proposals for new or upgraded telecommunications and associated equipment will be supported, including masts, cabinets and other related equipment, and should be located so as to minimise any adverse effects ensuring that:
   a) the installation(s) are kept to a minimum, consistent with the efficient operation of the network;
   b) opportunities for the sharing or clustering of facilities has been fully considered, including siting masts on existing buildings;
   c) they are sited and designed to minimise their visual impact and appearance, including through the choice of materials and colour;
   d) they do not cause undue harm to the character or appearance of the associated building or area;
   e) appropriate planting and landscaping has been incorporated to help screen installations; and
   f) there is no undue harm to highway safety or the functionality of other street furniture.

Policy implementation

3.30 Digital technology will help deliver social and economic growth and plays a vital role in the provision of local community facilities and services. The Council will expect development to be supported by the latest digital infrastructure and encourages early discussions with operators.

3.31 The criteria set out in this policy aim to minimise the intrusion of equipment by promoting shared use of masts, locating equipment on existing structures (e.g. tall buildings) and seeking the most sensitive location and design of equipment.

3.32 Much of the development undertaken by code systems operators is permitted development but some development requires prior approval of details of the siting or appearance of the equipment. In determining full planning applications, the Council will take account of Government guidance including in statutory regulations as relevant.

3.33 National planning guidance outlines that telecommunications applications must be supported by detailed information including consultations with interested organisations and a certification that the operational exposure for new masts or base stations (or additions to existing) will not exceed International Commission on non-ionising radiation protection guidelines.

➲ SP4: Supporting successful town centres

Related plans, strategies and key evidence – why we need this policy

Town Centres Strategy
Bexley Retail and Leisure Study
Retail and Town Centres Technical Paper
Employment Land Review Update
Bexley Obesity Strategy

3.34 Evidence shows that town centres now function as much more than a retail destination, providing a large range of services, facilities, employment and experiences for residents in an accessible location. The Council wishes to ensure that this expanding role is encouraged, allowing a greater diversity of town centre uses and therefore reducing the need to travel.

3.35 Creating and supporting a thriving local economy has positive benefits for residents, ranging from health outcomes and employment opportunities to community cohesion and crime reduction.

3.36 The London Plan also sets out a town centre hierarchy, of which Bexley's network is a part. Policy SP4 ensures that Bexley's town centres continue to grow and develop in a way that supports and strengthens the town centre network hierarchy for the borough.

SP4 Supporting successful town centres

1. To realise a network of successful town centres, the Council will work with key stakeholders including the Mayor of London and Business Improvement Districts (BIDs), to maintain and enhance the vitality and viability of the borough's hierarchy of town centres. In particular, the Council will:
   a) support proposals for main town centre uses in Bexley's defined town and local centres, including residential-led development on appropriate sites;
   b) ensure that all new development is appropriate in scale, design and location, and does not negatively impact on the hierarchy in accordance with national and regional policy and local need;
   c) maintain town centres as the places where commercial, business and service uses are concentrated, as designated on the submission policies map, and support development proposals for the intensification, renewal and modernisation of these uses.;
   d) seek to secure a healthy mix of shop sizes and types, as well as encourage the introduction of pop-up shops and other appropriate temporary uses, including for cultural and creative uses, where they support the vitality and viability of the centre;
   e) apply the town centre sequential test to all relevant developments as set out in national and regional policy and the retail impact assessment on new developments and redevelopments over a locally set threshold of 280m^2 gross;
   f) support an evening economy across our town centres, and a night-time economy in Bexleyheath, with new development supporting the creation of a comfortable, safe, attractive and accessible day and evening environment;
   g) support the development of new cultural venues in town centres and places with good public transport connectivity;
   h) strongly encourage hot food takeaway operators to comply with the Healthier Catering Commitment standards;
   i) support the creation of attractive town centre through high-quality design;
   j) work with partners to enhance existing markets and, where appropriate, to establish new markets;
   k) promote the provision of Shopmobility schemes or similar to ensure maximum accessibility for all;
   l) seek to ensure that the vitality and viability of the borough's designated neighbourhood centres are maintained and enhanced in order that they continue to provide a level of service of neighbourhood significance; and
   m) develop a town centre strategy for each town centre in accordance with London Plan requirements.

Policy implementation

3.37 Bexley's town centres should be able to respond rapidly to changes in trends for leisure, retail and other commercial uses to ensure they remain lively and viable places, with low vacancy rates and healthy footfalls. The requirements of national guidance now create a more balanced offer of retail and leisure within town centres protecting the town centre first approach, including the use of sequential and impact tests for appropriate developments.

3.38 New development in or around town centres will be required to positively contribute to the town centres' viability and vitality, as well as helping create a safe, attractive and accessible environment, both during the day and evening. Detailed guidance and information will be set out in the Design Guide SPD.

3.39 The evening economy is town centre activities that tend to finish around 11pm. The night time economy refers to establishments with late night licences that can run into the early hours of the morning, particularly at weekends.

3.40 Residential development within town centres is supported above ground floor level, where this does not harm the viability and vitality of the town centre. It is recognised that residents living in town centres should anticipate a different level of amenity that those in primarily residential areas. Separation distances may be closer, or noise levels higher, for example. The agent of change principle in the London Plan supports this approach.

3.41 Active street frontages (such as frequent doors and windows) should be achieved where there are ground floor residential frontages within a town centre.

3.42 Findings from the Retail Capacity Study suggest a local impact assessment threshold for retail and leisure development of 280m2 (gross) is appropriate for Bexley. This applies to new and replacement gross retail floor space (the redevelopment of existing floor space alongside additional floor space) where this is outside of an existing centre. This ensures that a town centre first approach is maintained towards cumulative incremental increases in out-of-centre retail stores that could materially change the nature of a whole scheme through small extensions.

3.43 The Healthier Catering Commitment (HCC) is a pan-London voluntary project, locally run to encourage restaurants, cafes and takeaways to make a commitment to adopting healthier food preparation practices and offer healthy options. The Council will work with businesses to create the business case for supporting healthy lifestyles and explore the possibility of instigating a Bexley Business Award focussed on Healthy Lifestyles. The Bexley Obesity Strategy provides further information and guidance.

3.44 Shopmobility schemes should use innovative approaches, such as the use of E-assist pedal scooters where possible rather than reliance on full Electric mobility scooter.

➲ DP9: Development within town centres

Related plans, strategies and key evidence – why we need this policy

Town Centres Strategy
Bexley Retail and Leisure Study
Retail and Town Centres Technical Paper
Employment Land Review Update
Bexley Obesity Strategy
Article 4 Directions Technical Paper

3.45 The London Plan identifies a range of measures boroughs should undertake in relation to town centres, including setting out policies for each type of area within centres. The NPPF requires boroughs to make clear the range of uses permitted in designated town centres. Town centres are places where a wide range of uses help to ensure vitality and viability is maintained. This policy sets out appropriate uses by location within a centre.

3.46 To ensure that a healthy balance of uses is maintained, the Council will actively manage through the planning process the concentration of different Use Classes (where it can do so through the Use Class Order) within town centres by designating town centre boundaries where commercial, business and service uses are concentrated.

3.47 A review of town and neighbourhood centres has been carried out and the updated hierarchy of town centres and town centre boundaries are shown on the submission policies map. The definition of each type is set out in the London Plan, which states in Part C of Policy SD8 that changes to District, Local, Neighbourhood centres can be brought forward through Local Plans where supported by evidence in development capacity assessments and town centre health checks and subject to assessments of retail impact where appropriate.

3.48 The additions of Lower Belvedere as a district town centre, and Abbey Wood Village, Bexleyheath Station and Sidcup Station as local town centres have been assessed in the review and information is provided in the Retail and Town Centres Technical Paper. The Bexley Retail and Leisure Study has informed the new town centre boundaries and the allocation of future retail capacity.

3.49 The development of a planning framework for the Bexley Riverside Opportunity Area will further define the development of Lower Belvedere District Centre to help to improve the town centre to make it more sustainable.

3.50 The town centre boundaries are sufficient enough tools to manage the range of uses across town centres and will therefore replace the previously designated core and non-core frontages. The new town centre boundaries reflect the current shopping patterns, the changing nature of the role and function of town centres, and the more diverse mix of uses that contribute to this, including residential. Because of this, and the introduction of the new E Use Class that incorporates retail uses, the Primary Shopping Area (PSA) for each town centre will encompass the same area as the town centre boundaries.

3.51 This policy applies to the following town centres or hierarchy level:

- Major Centre – Bexleyheath
- District Centres –Crayford, Erith, Lower Belvedere (new designation), Sidcup, Welling
- Local Centres – Abbey Wood Village (new designation), Bexley Village, Bexleyheath Station (new designation), Blackfen, Northumberland Heath, Sidcup Station (new designation), Upper Belvedere

DP9 Development within town centres

1. The Council will promote a diversification of town centre uses, including commercial, business and service uses, community, leisure, cultural and recreational uses, and residential uses, whilst avoiding an over concentration of any one non-class E use.

2. Development proposals in town centres will need to demonstrate that the Agent of Change principle has been considered.

3. Changes of use that would result in a net loss of ground floor main town centre uses within the designated town centre boundary will be resisted.

4. Changes of use that would result in a net loss of ground floor Class E uses within the town centre boundary should ensure that:

   a) the proposed use is a main town centre use;
   b) the use contributes to the vitality and viability of the town centre;
   c) a significant percentage of the units within the town centre boundary will remain in Class E use;
   d) the proposed use has an active frontage immediately accessible from the street; and,

DP9 Development within town centres

e) the proposed use would not result in two or more adjoining units of takeaways, betting offices/shops, pay day loan shops, and pawn brokers, with a maximum of 10% of units with these uses collectively, and in any event, no one use above 5% of units, across the town centre.

Policy implementation

3.52 Use Class E Commercial, business and service, was introduced to the Town and Country Planning (Use Classes) Order in September 2020. This allowed for a greater range of movement between different uses within this class that are automatically permitted without the need to apply for planning permission. More information can be found on the Government's Planning Portal website.

3.53 Main town centre uses are defined in the Glossary of the NPPF. These include retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

3.54 For the purposes of this policy, Use Classes F1(d) public libraries and F2(b) local community halls are considered main town centre uses.

3.55 Due to the importance of the maintenance of a critical mass of commercial uses to the viability and vitality of the borough's town centres and the importance of these units in meeting employment need within the plan period, the Council will be monitoring the level and distribution of business and commercial units in its centres. Should this monitoring indicate, or other emerging policy changes threaten, harm to amenity or wellbeing, the Council will explore additional measures to provide protection for these areas. This will include the introduction of an 'Article 4 Direction.'

3.56 Within town centres, residential uses above shops are generally supported. It would be appropriate for access doorways and entrances to be located at ground floor level for accommodation above. The Council is considering the use of an Article 4 Direction that would remove the permitted development rights for existing Class E uses to convert to residential use at ground floor level within town centres.

3.57 The Agent of Change principle is set out in the London Plan. It places the responsibility for mitigating the impact of existing noise and other nuisances firmly on the new development. The onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts. Applications for development proposals in town centres should clearly demonstrate how noise and other nuisances will be mitigated and managed.

3.58 As a general rule of thumb, a shopping unit is that part of the unit facing the main road. One unit is considered to have a linear width of between five and ten metres. Anything below or above this width will be calculated proportionately (i.e. a shop front with a width of 12 metres will be considered two units and less than five metres will be considered half a unit). Guidance on creating active shopfronts, including window displays, will be set out in the Design Guide SPD.

3.59 Some sui generis uses are not considered to be town centre uses and will therefore be assessed on a use-by-use basis taking into account recent changes in the Use Class order regarding takeaways,

betting shops and pay day loan shops. When any secondary use becomes more than just ancillary to the primary use it becomes a mixed-use sui generis unit.

➲ DP10: Neighbourhood centres and small parades

Related plans, strategies and key evidence – why we need this policy

Bexley Retail and Leisure Study
Retail and Town Centres Technical Paper
Article 4 Directions Technical Paper

3.60 The NPPF notes that planning policies should aim to achieve healthy, inclusive and safe places which promote social interaction through strong neighbourhood centres and the provision of local shops and other local services. The London Plan states that boroughs should identify and promote the complementary offers of the smaller centres in the network including neighbourhood centres and small shopping parades.

3.61 This policy seeks to ensure that local people have immediate and convenient access to services and facilities to meet their day-to-day needs through the maintenance of the borough's supply of retail provision. It recognises that neighbourhood centres and small shopping parades are important for health, wellbeing and social interaction.

3.62 These play a key role in meeting 'walk to' every day needs and are often the core of healthy lifetime neighbourhoods. Planning policies should guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs. They should also ensure that established shops, facilities and services are able to develop and modernise, and are retained for the benefit of the community.

3.63 The borough-wide network of neighbourhood centres is listed in Table 8, small parades listed in Table 9 and locations identified on the submission policies map.

DP10 Neighbourhood centres and small parades

1. Changes of use from Class E in designated neighbourhood and small parades will be supported if:
   a) the use positively contributes to the vitality and viability of the parade;
   b) the proposed use would include an active frontage immediately accessible from the street;
   c) the proposed use would not result in two or more adjoining units of takeaways, betting offices/shops, pay day loan shops and pawn brokers, with a maximum of one unit or 10% of units with these uses collectively across the neighbourhood centre
   d) the proposed use would not result in more than one unit of takeaways, betting offices/shops, pay day loan shops, and pawn brokers, across the small parade.

2. Neighbourhood centres are expected to contribute to projected jobs growth over the Plan period and commercial, business and services functions within the centre should not be lost to residential uses.

Policy implementation

3.64 Use Class E Commercial, business and service, was introduced to the Town and Country Planning (Use Classes) Order in September 2020. This allowed for a greater range of movement between different uses within this class that are automatically permitted without the need to apply for planning permission. More information can be found on the Government's Planning Portal website.

3.65 The Council is considering the use of an Article 4 Direction that would remove the permitted development rights for existing Class E uses to convert to residential use at ground floor level within neighbourhood centres and small parades of shops. These very local shopping areas provide walk-to services, contributing the liveable neighbourhoods, and are the most likely to be lost completely if ground floor commercial uses were not protected.

3.66 A proliferation of certain sui generis uses can negatively affect the vitality and viability of Bexley's neighbourhood centres and small shopping parades and can have an impact on people's health, including mental health. These uses could be hot food take-away shops, betting shops, payday loan shops, pawnbrokers and amusement arcades, amongst others. In addition, the London Plan sets out policies with regard to hot food takeaway uses.

Neighbourhood centres and small parades of shops

Name of neighbourhood centre	District	Streets
1. Albany Park	Sidcup	10 to 60 (even) Steynton Avenue (including 34b) and Albany Park railway station foyer
2. Barnehurst	Bexleyheath	286 to 314 (even) Erith Road 81 to 99 (odd) and 92 to 102 (even), and the Red Barn Public House, Barnehurst Road
3. Bellegrove Parade	Welling	211 to 231 (odd) Bellegrove Road 2 to 10 (even) Welling Way
4. Blendon Road	Blendon	133 to 165 (odd), and the Three Blackbirds Public House, Blendon Road
5. Falconwood Parade	Falconwood	1 to 23 (consecutive) Falconwood Parade
6. Foster's Parade	Welling	62 to 86 (even) Upper Wickham Lane
7. Halfway Street	Sidcup	158 to 198 (even) Halfway Street, including 162a, 176a, and 188a, 188b, 188c and 188d
8. Hollytree Parade	Foots Cray	1 to 7 (consecutive) Hollytree Parade, Sidcup Hill 1 to 17 (odd), 2 to 7 (consecutive) Cray buildings, and the Seven Stars Public House, Foots Cray High Street
9. Lion Road/Broadway (west of Lion Road)	Bexleyheath	1 Lion Road 230 to 246 (even), the Golden Lion Public House, 262 to 300 (even), 308 to 318 (even), 265 to 299 (odd), 303 to 309 (odd) and 323 to 337 (odd) Broadway, including 280a, 303a, 309a and 310a
10. Long Lane	Bexleyheath	131 to 165 (odd) and 138 to 158 (even) Long Lane
11. Marechal Niel Parade, Main Road	Sidcup	1 to 10 (consecutive) and 1a and 1b Marechal Neil Parade 259, 261, 265 to 287 (odd) Main Road
12. Midfield Parade, Mayplace Road East	Bexleyheath	1 to 12 (consecutive) Midfield Parade 59b, 61 to 69 (odd), 158 to 166 (even) and 158b and 158d Mayplace Road East
13. Montpelier Avenue	Bexley	1 to 25 (odd) Montpelier Avenue

Name of neighbourhood centre	District	Streets
14. Sherwood Park Avenue	Blendon	242 to 278 (even) Sherwood Park Avenue
15. Slade Green Station	Slade Green	35 to 49 (odd) Forest Road
16. Southmere Village	Abbey Wood	Final address points to be defined with completion of the Southmere Village development
17. St. James Way	North Cray	70 to 94 (even) St. James Way
18. The Oval	Sidcup	1a, 1b, 3 to 53 (odd) The Oval
19. The Pantiles	Bexleyheath	2 to 24 (even) and 3 to 11a (odd) The Pantiles

Table 8: Bexley's neighbourhood centres

Name of small parades	Location	Streets
20. Belmont Road and Mill Road	Erith	1 to 7a (odd) Belmont Road 85 and87 Brook Street 70 and 72 Mill Road
21. Brampton Road/Long Lane	Bexleyheath	287, 289 and 295 to 305 (odd) Brampton Road
22. Brampton Road/Shakespeare Road	Bexleyheath	152 and 154, and 209 to 217 (odd) Brampton Road
23. Bridge Road	Slade Green	7 to 15 (odd) Bridge Road
24. Chieveley Parade	Bexleyheath	1 to 8 (consecutive) Chieveley Parade, Mayplace Road East
25. Colyers Lane	Erith	137 to 145 (odd) Colyers Lane
26. Dartford Road/Old Bexley Lane	Bexley	1 to 9b (odd) Dartford Road
27. Days Lane	Sidcup	189 to 197 (odd) Days Lane
28. Erith Road/Bus Garage	Bexleyheath	122 to 134 (even) Erith Road
29. Falconwood Station	Falconwood	1 to 17b (odd), and the Falcon Public House, Lingfield Crescent and Falconwood railway station foyer
30. Hadlow Road	Welling	57 to 77 (odd) Hadlow Road
31. Lessness Avenue	Bexleyheath	3 to 13 (odd) and 42 to 56 (even) Lessness Avenue
32. Lime Row	Belvedere	1 to 7 (consecutive) Lime Row
33. Lower Road	Belvedere	90 to 112 (even) Lower Road
34. Maidstone Road	Foots Cray	65 to 79 (odd) Maidstone Road
35. Park View Hub, Yarnton Way	Abbey Wood	190 to 206 (even) Yarnton Way

Name of small parades	Location	Streets
36. Park View Road/Danson Mead	Welling	30 to 46a Park View Road
37. Parkside Parade/Northend Road	Erith	1 to 7 (consecutive) Parkside Parade, Northend Road
38. Parsonage Manorway	Belvedere	88 to 104 (even) Parsonage Manorway
39. Pembroke Road/Alford Road	Erith	1, 1a and 2 Pembroke Parade, Pembroke Road 1 to 7 (consecutive) Alford Road
40. Stelling Road	Erith	30 to 40 (even) Londonderry Parade, Stelling Road
41. Upper Wickham Lane/Queen's Road	Welling	172, 178 to 182 (even), 198 and 200 Upper Wickham Lane
42. Woolwich Road	Belvedere	13a and 15 to 21 (odd) Woolwich Road
43. Wrotham Road	Welling	46 to 64 (even) Wrotham Road

Table 9: Bexley's small parades

4. Bexley's character: reflecting our diversity and heritage through high-quality design

Related Council overarching strategies

Bexley Growth Strategy
Bexley Local Character Study

4.1 Bexley is characterised by a number of specific features worthy of protection and enhancement, including its heritage, character and areas of family friendly housing. This chapter sets out the strategic and non-strategic policies to address how these characteristics will be preserved and how new development is expected to achieve this.

4.2 The principle of design covers a wide range of matters that should be applied to all types of development. The policies in this chapter set out Bexley's strategic and detailed requirements for ensuring high-quality design in the borough.

4.3 The historic environment forms part of Bexley's identity and cultural heritage. It incorporates a wide variety of assets and can help support the borough's communities, particularly through tourism, leisure and recreation.

➲ SP5: Placemaking through good design

Related plans, strategies and key evidence – why we need this policy

Bexley Local Character Study

4.4 Good design is a key aspect of sustainable development and is indivisible from good planning. It should contribute positively to making places better for people. National and regional policy makes clear that local authorities should not attempt to impose a certain architectural style, but rather to establish principles to determine whether good design is being followed.

4.5 A key consideration is the local character and context and reinforcing local distinctiveness. This policy seeks to ensure that new development has regard to the local area's character and heritage, thus ensuring that the character of Bexley's neighbourhoods retain their authenticity whilst instilling a unique sense of place.

4.6 Good design identifies fundamental elements of character and builds upon them, enhancing local distinctiveness. Where existing character is poor, design should help to mend that character. Inspiration can still be taken from it, through an understanding of character in the broader sense than 'what's currently on the ground.' Instead, clues can be taken from, amongst other things, the historic development and topography of the area. Good design creates variety and adds identity to its surroundings.

4.7 A review has been carried out on Bexley's current planning design guidance, including Design for living, Bexley's residential design guide, the Bexley Sustainable Design & Construction Guide, and Design and Development Control Guidelines 2 through 9 from the Bexley Unitary Development Plan. Relevant updated guidance from these documents will be incorporated into the Design Guide SPD, which will be informed by the Bexley Local Character Study.

SP5 Placemaking through good design

1. The Council will continue to expect the highest quality standards of design in Bexley. Design should respect the existing character and context but need not be constrained by what already exists; local character evolves over time. The Council will seek to ensure that:
   a) all development within the borough is of high-quality design, contributes positively to the local environment, and protects the best elements of Bexley's character;
   b) design enhances social cohesion and health and wellbeing and considers the principles of inclusive and active design, in order to support good physical and mental health; and,
   c) design considers the relationships between building and spaces, including its contribution to and shaping of the public realm.
2. The Council will masterplan future development, where appropriate, to ensure it achieves the objectives of sustainable development and proposals for developments in these areas will need to demonstrate that they will fit satisfactorily into the masterplan.
3. In locations suitable for large developments, proposals that are piecemeal in nature will normally be resisted unless the proposal demonstrates that it will fit satisfactorily into a larger development.

Policy implementation

4.8 Development should create beautiful buildings and contribute to a high-quality public realm which is comprehensible at a human scale following the healthy streets principles to create a streetscape that engages the pedestrian and helps to create a meaningful transition between the public, semi-public, and private realm. Principles of dementia and autism friendly design should be applied.

4.9 It is important to ensure that piecemeal development does not prejudice the proper planning of a large development whether or not the large development site is formally identified in site allocations. Development must either consider the larger site or must demonstrate how the development proposal will not prejudice the optimisation of the larger site, in terms of layout, open space, access and infrastructure, amongst other issues relevant to the particular site.

4.10 Inclusive design ensures the development proposal is optimised for a specific user with specific needs. The Design Council provides further information. Sport England has produced 'Active Design,' which establishes 10 principles for ensuring that active and healthy lifestyles are supported and enhanced through the built environment.

4.11 Further advice and guidance applying to all development will be set out in the Design Guide SPD, which will include appropriate development densities by type and location. National design guidance and design guidance supporting the London Plan also provide information on design matters.

➲ DP11: Achieving high-quality design

Related plans, strategies and key evidence – why we need this policy

Bexley Local Character Study

4.12 Whilst Policy SP5 sets out the broader principles to achieving high-quality design within the borough, it is necessary to provide additional detail to ensure the creation of well-designed developments that respond positively and effectively to the locally specific character of the area.

DP11 Achieving high-quality design

1. Development proposals within a primarily residential area, as defined on the submission policies map, must seek to protect or enhance the area's character and its amenities. Proposals for uses other than those residential in nature, will only be acceptable where they provide community, social or leisure facilities, or employment uses compatible with a residential area.

2. Development proposals for new buildings, extensions and alterations, conversions, changes of use and public and private spaces will be expected to follow the principles and requirements set out in this document and to:

Character

a) ensure that the layout, height, scale and massing, façade treatment, and materials are complimentary to the surrounding area contribute positively to the street scene

Landscaping

b) provide a high standard of landscaping design, appropriate to the proposal and with regard to the character of the surrounding area

Privacy, outlook and adverse impacts

c) ensure that appropriate levels of privacy, outlook, natural daylight and other forms of amenity are provided
d) ensure existing properties' amenity is appropriately protected
e) ensure that all proposed development and uses do not unacceptably affect residents or occupiers of either the proposed development or of existing neighbouring residents, businesses and community facilities by means of noise, odour, vibration and light spill or other disturbances

Quality of residential accommodation

f) provide sufficient useable on-site external amenity space (communal, semi-private and private) and appropriate play spaces for children, relative to the proposed scale of development
g) meet appropriate internal accommodation standards

Crime

h) apply the principles of designing out crime whilst maintaining an attractive, connected environment

Advertisements

i) ensure that new advertisements do not detract from the character and appearance of the surrounding area and do not have an adverse effect on public safety

Policy implementation

4.13 The Design Guide SPD will contain detailed guidance and further information on how the policies of this Local Plan should be applied to matters of design, for all types of development, in the local context. This includes addressing appropriate density, design for specialist housing; extensions and conversions, including basement development; and additional detail on housing design standards, including internal standards.

4.14 Criteria should be implemented where they are relevant and appropriate. Depending on the nature of the proposal, not all criteria will be relevant in all cases. A matrix style checklist may be developed to help understand the differences in design requirements for different scales of

development, from changes of use and conversions and extensions through to large developments. Conversions are the development of two or more dwellings from a lesser number of dwellings.

Character

4.15 The character of an area is made up of both the buildings and the spaces around them. Scale is considered to be relative to the locality and context, massing is considered in terms of volume and is a free-standing measurement.

4.16 Ensuring that materials are complimentary to the surrounding area does not mean they have to match. They should be of an appropriate style that is compatible with and can even contrast with, as long as it does not jar or clash with the locality. Appropriate landscaping and active frontages, such as entrances and windows along the façade, can enhance the street scene.

Landscaping

4.17 Urban greening as part of the development process can play a vital part in Bexley's green infrastructure network, improving air quality, reducing the risk of flooding and helping to mitigate the effects of the urban heat island. This can include walls and roofs covered in plants, street trees and small pocket parks in-between buildings. The principles of the urban greening factor (UGF) in the London Plan should be adhered to in major developments, including it at the start of the design process.

Privacy, outlook and adverse impacts

4.18 Privacy is important to enable residents to feel comfortable in their own homes. Innovative design solutions to achieve a high standard of privacy, amenity and outlook are encouraged. New development should take responsibility for mitigating the impact of existing noise and other nuisances in accordance with the agent of change principle set out in the NPPF. In addition, the London Plan includes policy D12, providing further guidance on applying the agent of change principle.

4.19 Developers are required to consider the impact of their developments on neighbouring uses, as well as the potential impact that existing neighbouring uses could have on the proposed development, particularly with regard to noise. The Council will seek to employ the agent of change principle, by which the person or business responsible for the change is responsible for managing the impact of the change for both the existing and proposed uses.

4.20 Identified impacts should be mitigated through design. The layout, orientation, design and use of buildings will ensure that operational noise does not adversely affect occupants or neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces. Where necessary, development is required to robustly demonstrate how conflict with existing uses will be avoided, through mitigation measures.

Quality of residential accommodation

4.21 Amenity space makes an important contribution to the character of an area through the setting of buildings in their locality. When quantifying the amount of amenity space to be provided within new development, the measure of this space should include functional elements such as gardens, balconies, terraces and roof gardens and exclude areas for vehicle circulation or parking and incidental green spaces. The Design Guide SPD will set out standards regarding the amount of usable on-site amenity space.

Crime

4.22 Design has an important role to play in preventing crime and reducing criminal activity and should be designed-in at the start of the process. Careful consideration of designing out crime can prevent or reduce incidences of crime without compromising the enjoyment, usability and attractiveness of the development. More information can be found in Designing out crime: A designer's guide by the Design Council.

Advertisements

4.23 Advertisements can often be unsightly and detract from the appearance and character of the environment. They can constitute potential hazards if they obscure traffic signals or obstruct traffic sight-lines or directional signs. Most conservation areas, by their special nature, are particularly sensitive to the visual impact of advertisements. The Council will therefore impose strict controls over the display and illumination of advertisements and signs within sensitive areas, particularly conservation areas. Further guidance with regard to advertisements will be detailed in the Design Guide SPD.

DP12: Tall buildings and building heights

Related plans, strategies and key evidence – why we need this policy

Bexley Local Character Study
Local Plan Spatial Strategy Technical Paper
Building Heights Technical Paper
Locally Significant Views within London Borough of Bexley Draft Report

4.24 The need to use land efficiently and to its full potential in order to provide more homes across all tenures will require an increase in development density in appropriate locations across the borough, with an emphasis on achieving higher densities with more human scaled typologies.

4.25 Bexley is currently a borough of relatively low density development and few tall buildings when compared to other parts of London. As well as one approach to achieving higher density, taller buildings can be used for place-making purposes, to create iconic buildings, to create landmarks and contribute to wayfinding. Therefore it is important to provide a guide to appropriate building heights within the borough.

4.26 Appropriate locations for taller buildings have been informed by the Local Plan spatial strategy (Policy SP1 and the Key Diagram), the Bexley Local Character Study and the local strategic views framework . Some locations in the borough already have quite tall buildings but this does not set a precedent for more tall buildings in these areas if the area has not been identified as being suitable.

DP12 Tall buildings and building heights

Borough-wide building heights

1. Typically, the maximum height of buildings shall not normally be more than:
   a) 45 metres within and near the town centres of Abbey Wood Village and Lower Belvedere, as set out in Part 2 of this policy;
   b) 25 metres in sustainable development locations as identified on the key diagram (Figure 1) outside of Part 3a of this policy; and,
   c) 15 metres across the rest of the borough.

DP12 Tall buildings and building heights

2. For development proposals that include buildings taller than 15 metres, applicants must submit design appraisals with alternative options to demonstrate whether similar densities can be achieved using more traditional and human-scaled typologies including terraced housing, maisonettes, and courtyard apartments.

3. The proposed heights for buildings should reflect other design and policy requirements, including the requirement to have regard to the existing or emerging character and context of the area.

Tall buildings

4. Tall buildings in Bexley are considered to be more than 25 metres in height and must comply with the tall buildings policy in the London Plan. In addition, the applicant must demonstrate:

   a) sufficient access to public transport;
   b) access to local services and facilities, depending on the number and type of residents expected;
   c) the proposal will not have an adverse impact on local character, including heritage assets;
   d) the design considers topography;
   e) the proposal will not create adverse environmental impacts, including flood risk, creation of a wind tunnel, loss or lack of daylight and sunlight;
   f) the design is of the highest architectural quality; and
   g) the proposal will integrate into its surroundings at all levels, particularly at street level and into the skyline.

5. Suitable locations for tall buildings are within and near the town centres of Abbey Wood Village (defined in Figure 4) and Lower Belvedere (defined in Figure 5).

Policy implementation

4.27 This policy seeks to achieve higher levels of residential density through alternative and more traditional housing typologies. Where a taller building is proposed for housing, this policy requires developers to submit alternative design approaches that employ more traditional typologies to demonstrate whether equivalent residential densities (measured in internal floor space or habitable rooms) can be achieved.

4.28 For clarity, the building height is the vertical distance between finished grade and the highest point on the building, including any plant located on the roof. On sloped sites the building height is measured from the average finished grade to the highest point on the building.

4.29 The equivalent height in residential storeys is typically:

- up to four storeys for 15 metres;
- up to eight storeys for 25 metres; and
- up to 15 storeys for 45 metres

4.30 Non-residential buildings will have varying storey heights; therefore, it is the overall building height that is measured rather than the number of storeys.

4.31 Suitable locations for buildings up to 25 metres in height align with the principle of developing at higher densities in areas that have key public transport links with good connectivity and that have good access to services and facilities. These are the sustainable development locations set out in Policy SP1, illustrated by the spatial strategy (Figure 1) and also set out on the submission policies map.

4.32 Bexley's contribution to London's economic growth will be achieved in part by intensification of the borough's designated industrial locations. All designated SIL in the borough is considered to be a sustainable development location for industrial uses and therefore appropriate for the optimisation of sites including increased building heights, as defined by Part 1.b) of this policy.

4.33 In the borough's sustainable development locations (defined in Policy SP1 and Figure 1) taller buildings are considered to be between 15 and 25 metres in height. Building typologies, such as mansion blocks, perimeter blocks, or stacked maisonettes, are the borough's taller buildings of choice for residential or residential led mixed-use development. These typologies achieve higher levels of density whilst fitting in sympathetically to the borough's predominantly lower density residential character.

4.34 The parts of the borough outside of the sustainable development locations, illustrated on the key diagram and submission policies map, is considered inappropriate for taller building heights and a maximum building height of 15m applies. Proposals for development outside of the sustainable development locations should include an options appraisal as part of the design and access statement, as well as demonstrating that the scheme is sustainable, in line with Policy SP1.

4.35 Height should be an output of other considerations. Buildings should not be designed to reach certain heights. Development proposals should ensure that they contribute to the placemaking of the wider area. Planning applications for schemes with tall buildings should justify the proposed heights with regards to these considerations and the requirements of the policy.

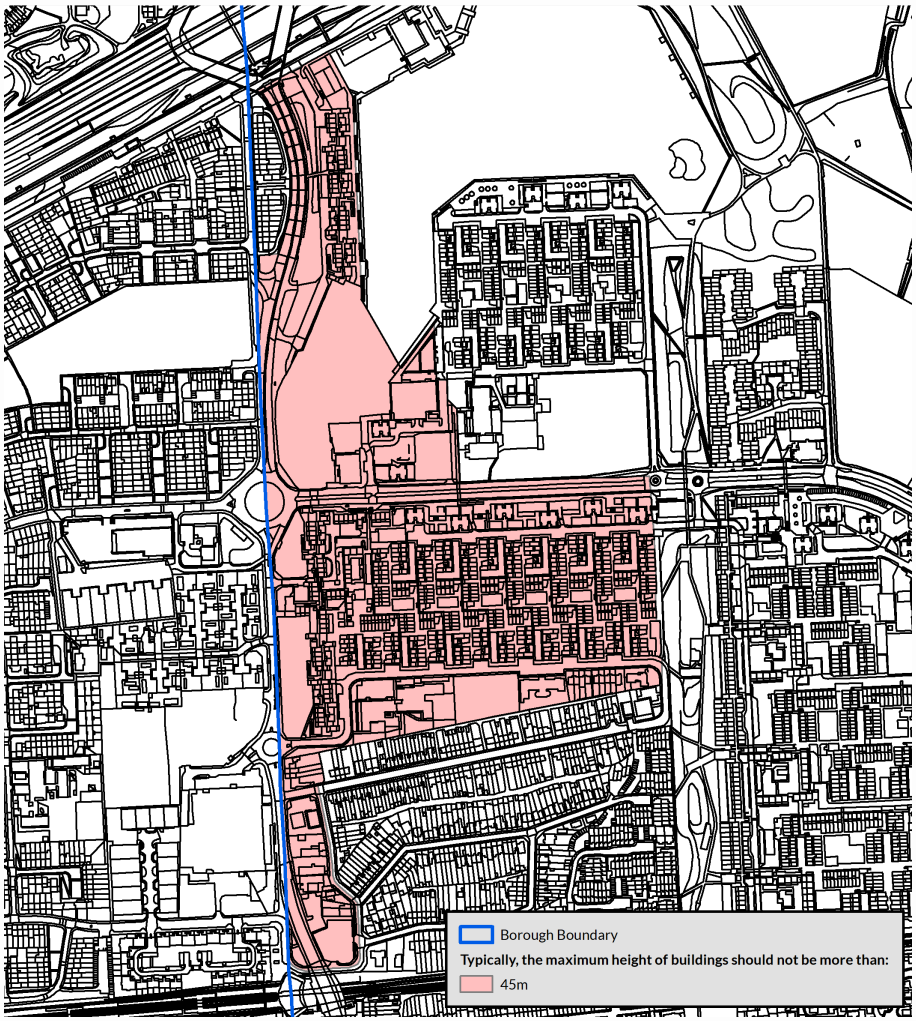


Figure 4: Thamesmead and Abbey Wood location where a maximum building height of 45 meters would be acceptable

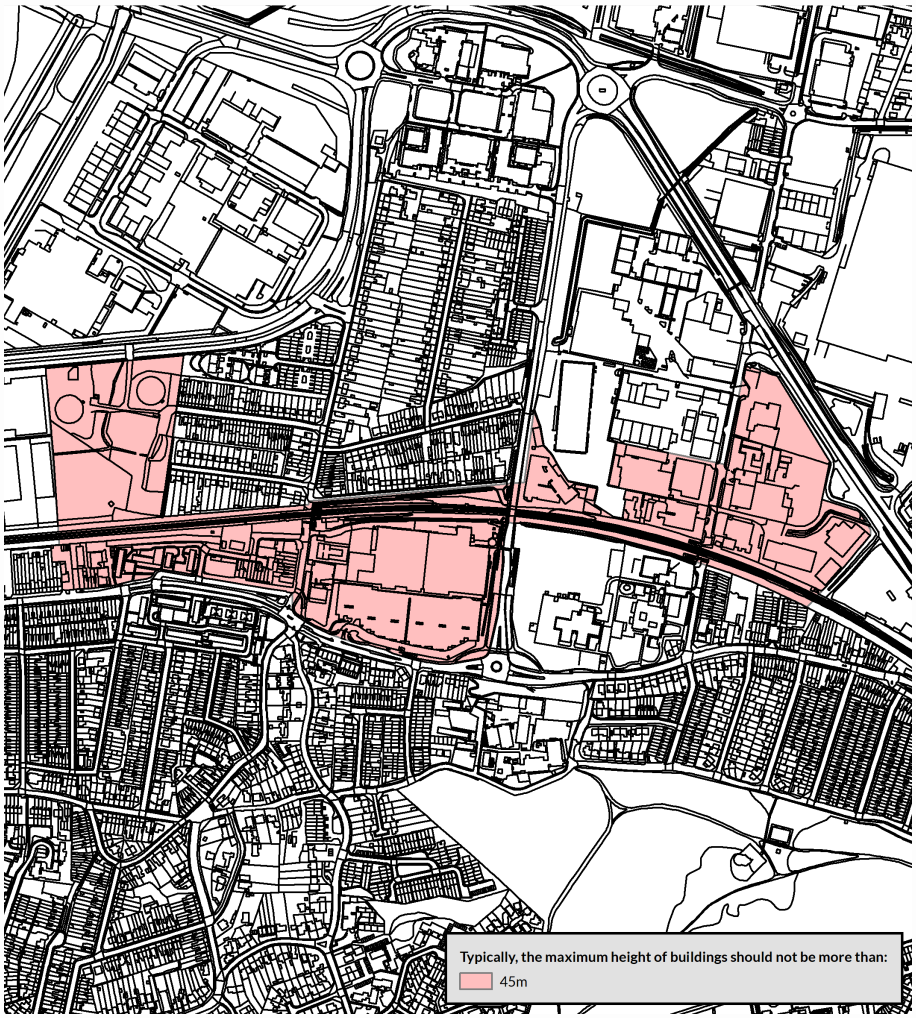


Figure 5: Belvedere location where a maximum building height of 45 meters would be acceptable

4.36 Tall buildings, in the context of Bexley, are defined in the policy as being more than 25 metres in height. Buildings taller than 25 metres may have a place in Bexley in very few locations, and only when they respect the character of their local areas and do not obstruct designated local views. The areas near to Abbey Wood and Belvedere railway stations, illustrated in Figure 4 and Figure 5, have been identified as suitable for tall buildings (up to a maximum height of 45 metres). This is based on evidence that has informed the Bexley Local Character Study, including a detailed Urban Morphology Study of the borough, and will be the exception rather than the rule. This should not be a uniform approach across a site, but rather the tall buildings should be in key locations on the site.

➲ DP13: Protecting local views

Related plans, strategies and key evidence – why we need this policy

The London Plan 2021 – Policy HC 3
Locally Significant Views within London Borough of Bexley (May 2021) Draft Report

4.37 London Plan policy HC3 requires development plans to identify locally significant views and to set out what it is about the view that is significant. The Locally Significant Views within London Borough of Bexley report identifies views that possess sufficient architectural, townscape, landscape or environmental quality to be designated as protected local views.

DP13 Protecting local views

1. Development proposals with the potential to impact a protected local view must meet the following criteria:
   a) Development in the foreground and middle ground of a protected view should not be overly intrusive, unsightly or prominent to the detriment of the view;
   b) Development in the background of a protected view should give context to landmarks and not harm the composition of the view as a whole; and,
   c) Any existing or proposed viewing places within the development should be accessible and managed so that they enhance people's experience of the protected view.
2. Development proposals that will have a significant adverse impact on the aesthetic and character of a protected view will be resisted.
3. Development proposals should consider whether the proposal has the potential to impact on a non-designated view. Non-designated views should be identified through the Development Management process. A proposal with the potential to impact on a non-designated view must demonstrate that the proposal will not have an adverse impact on that view.

Policy implementation

4.38 Assessment of the impact of development in the foreground, middle ground or background of a protected view or the setting of a landmark will be made with regard to the significant features of local views that warrant their designation.

4.39 The protected views are not intended as a comprehensive list of all significant views within the borough; just because a view is not designated does not mean that it is not important. Additional views should be identified through the development management process, including through local character assessments or, for larger schemes, through townscape and visual impact assessments. This policy protects views identified through the development management process.

4.40 The Design Guide SPD will set out detailed guidance including submission requirements for development schemes. The local protected views will be included on the submission policies map.

➲ SP6: Managing Bexley's heritage assets

Related plans, strategies and key evidence – why we need this policy

Statutory List of buildings of special architectural or historic interest in Bexley
Locally listed buildings and structures in London Borough of Bexley of architectural or historic interest and 2020 Update
Historic England – Heritage at Risk Register 2020, London and the South East
Conservation area appraisals and management plans for the borough's designated conservation areas
Historic England – Greater London Archaeological Priority Areas
Historic England's Archaeological Priority Areas Appraisal for London Borough of Bexley

4.41 This policy ensures that Bexley's heritage assets are preserved and enhanced and their contribution to the borough's identity is recognised. If appropriate, they will be identified on the submission policies map (e.g. conservation areas).

4.42 Bexley's heritage and archaeological assets comprise registered historic parks and gardens, scheduled ancient monuments, listed buildings and structures, non-designated heritage assets of local architectural and historic interest (the Local List), conservation areas, and archaeological priority areas. All these assets contribute to the heritage of Bexley's built environment and add to the attractiveness and character of the borough. There is also an active record of locally listed buildings within the borough that are considered to have historic or architectural merit at the local

level. A complete list can be found in the Council's Historic Environment Record (a live document that is updated outside of the Local Plan process).

4.43 Statutorily listed buildings and structures include, at the highest level, Grade I listed Danson Mansion, Crossness Beam Engine House, and Red House and its well head. Hall Place and Gardens and Lesnes Abbey are also scheduled ancient monuments as well as being Grade I listed. The remaining listed buildings and structures are Grade II* and Grade II, with notable mentions for the Carnegie Library in Erith, Sidcup Manor House and two iconic K6 telephone boxes in Bexley Village.

SP6 Managing Bexley's heritage assets

1. The Council will manage its heritage and archaeological assets, whilst seeking opportunities to make the most of these assets; including adapting to and mitigating the effects of climate change. This will enhance the local sense of place and support the revitalisation and development of the borough, including promoting the visitor economy. This will be achieved by:
   a) promoting the borough's heritage assets, such as Lesnes Abbey, Danson Mansion, Hall Place and Gardens, Crossness Beam Engine House and Red House;
   b) reviewing the status of existing and identifying new heritage and archaeological assets;
   c) applying the NPPF and London Plan requirements for development proposals affecting heritage assets to conserve and enhance the significance of heritage assets, their settings, and the wider historic environment, and the requirements to protect assets from development that is likely to adversely impact on the significance, integrity, character or appearance of those assets or their settings;
   d) protecting the internal features of Council owned non-designated heritage assets where they contribute to the asset's significance; and,
   e) supporting historic restoration schemes through partnership working and seeking funding to enhance and utilise heritage and archaeological assets in an appropriate and sympathetic manner.

Policy implementation

4.44 The Council will seek opportunities to support the identification of heritage assets in the borough, as well as supporting restoration of historic assets, for example, through grants where they are available. There are also a number of specific projects being undertaken in the borough to preserve and enhance Bexley's heritage and archaeology, including works to the Crossness Beam Engine House.

4.45 The Council supports regeneration and development schemes that make use of historic assets in an appropriate and sympathetic manner. It will also keep under review its heritage and archaeological assets. This includes character appraisals and management plans for the borough's conservation areas, locally listed building and structure reviews, and the Heritage at Risk Register. Research has indicated that Bexley's heritage faces various challenges, including small incremental changes to buildings, low quality maintenance, and environmental impacts such as traffic congestion and graffiti.

➲ DP14: Development affecting a heritage asset

Related plans, strategies and key evidence – why we need this policy

Statutory List of buildings of special architectural or historic interest in Bexley
Locally listed buildings and structures in London Borough of Bexley of architectural or historic interest and 2020 Update
Historic England – Heritage at Risk Register 2020, London and the South East
Conservation area appraisals and management plans for the borough's designated conservation areas
Historic England – Greater London Archaeological Priority Areas
Historic England's Archaeological Priority Areas Appraisal for London Borough of Bexley
Article 4 Directions Technical Paper

4.46 Heritage assets make a strong contribution to the local economy. An asset's ability to create a sense of place and local identity is valued highly in Bexley. Heritage assets include: listed and locally listed buildings and other structures; conservation areas; registered parks and gardens; scheduled ancient monuments; archaeological remains; and any other non-designated asset which the local authority identifies as having historic or architectural significance. A complete list can be found in the Greater London Historic Environment Record (a live document that is updated outside of the Local Plan process).

4.47 Bexley currently has over 150 buildings and structures, and registered parks and gardens, on the National Heritage List for England. The statutory listing of a building or structure is recognition of its architectural and/or historical significance at a national level and provides additional protection. Only a very small number of buildings or structures in Bexley are statutorily listed, and these represent a very important limited resource. Continuity and preservation of original fabric is, therefore, important. This policy applies to planning applications and to applications for Listed Building Consent, and also applies to development proposals for buildings and structure on the local list. Development proposals to alter a building or structure, or its use in a way that could impact on the special character of the listed building or structure require Listed Building Consent.

4.48 Bexley currently has 23 conservation areas across the borough and the strategic policy requirement to conserve and enhance heritage assets is applied to these areas. It signposts the area appraisal and management plans, which describe the special characteristics of each conservation area and provide more detailed guidance on what is considered appropriate and inappropriate within the conservation area. The process for identification, designation and review of conservation areas sits outside of the Local Plan. However, these areas are identified on the submission policies map and in the conservation area appraisals.

4.49 Archaeology, specifically the remains below the ground, provides evidence of the evolution of development and settlements in this area. All remains are unique and represent a finite and non-renewable resource. The borough also has a wealth of archaeological remains, which represent a storehouse of historic information, including evidence of the evolution of development and settlements in the borough. Archaeological sites should be retained in situ wherever possible, and an appropriate level of archaeological investigation and documentation should be undertaken.

4.50 This policy provides a mechanism to manage new archaeological evidence. Further information and guidance, including the archaeological priority areas within Bexley, is set out in Historic England's Archaeological Priority Areas Appraisal for London Borough of Bexley. The appraisal establishes the relative potential significance of each of the priority areas.

4.51 The Greater London Archaeological Advisory Service (GLAAS) identify Archaeological Priority Areas (APAs) based on evidence held in the Greater London Historic Environment Record

(GLHER). Each APA is assigned to a tier reflecting their archaeological sensitivity and significance. APAs are non-designated heritage assets, but as set out in the NPPF (Footnote 63) where these are found to include sites or archaeology of national importance equivalent to Scheduled Monuments, these sites or archaeological findings should be accorded the same weight as designated heritage assets.

DP14 Development affecting a heritage asset

Impact on asset or setting

1. Development proposals with the potential to directly or indirectly impact on a heritage asset or its setting should meet NPPF requirements to describe the significance of the asset and demonstrate how the proposal conserves or enhances the significance of the asset.

2. Development proposals on sites with existing heritage assets, particularly listed or locally listed buildings, should incorporate those assets. Outline applications will not generally be acceptable for developments that include heritage assets.

Change of use

3. Any development proposal to alter or change the use of a heritage asset will need to conserve or enhance that asset; proposals must demonstrate how the change will support the building's preservation and future maintenance. Development proposals should restore, re-use and incorporate heritage assets, wherever possible. Proposals must demonstrate that the new use would not adversely affect the fabric of the building.

Demolition

4. There is a general presumption against any proposal for development that demolishes a heritage asset in part or whole, including locally listed buildings.

5. Proposals to demolish buildings within conservation areas will be considered with regards to the NPPF approach to determining harm and will generally be refused unless it can be demonstrated that the development proposal would enhance the special character of the area; demolition will not be approved until consent for the replacement building is agreed.

Listed buildings

6. Any proposed alteration must have regard for conserving or enhancing the special character of the building, both internally and externally. Replacement materials should be like for like or, where this is not possible or not preferable, should be compatible with the existing character of the building, either by sympathetically matching or contrasting.

Locally listed buildings

7. Any proposed alteration to a locally listed building or other non-designated heritage asset must have special regard to the asset's contribution to the streetscape.

8. Any proposed alteration to a locally listed building should conserve the particular characteristics that justify that structure's identification.

Conservation areas

9. Proposals for development within conservation areas must have due regard to the area appraisal and management plan in terms of design, use, and any other element identified as relevant.

DP14 Development affecting a heritage asset

Archaeological evidence

10. Development proposals should be assessing the archaeological potential of sites and then retaining, in situ, archaeological evidence within sites, wherever possible. Where archaeological evidence cannot be retained, the appropriate levels of archaeological investigation and recording should be undertaken prior to the redevelopment of the site.

Policy implementation

4.52 A development proposal will be considered to conserve a heritage asset if it would result in no impact on the asset, or an impact that is not adverse. A development proposal will be considered to enhance a heritage asset if it would restore or reveal a feature of significance.

4.53 Inappropriate alterations may irreparably damage the architectural or historic integrity of the building and will not be acceptable. It will therefore be expected that all original features of architectural or historic interest, both internal and external shall be retained. Alterations to these important buildings require the greatest skill and care in design and implementation in order to avoid damage to historic fabric and to ensure that any works are in keeping with the remainder of the building and its setting.

4.54 It is considered very unlikely that the demolition of a listed building could be justified. A building's setting is often an important part of its character. Schemes that affect the setting of a listed building can, if insensitively designed or located, detract from the special architectural or historic interest, or character of this valuable and limited resource.

4.55 The Council has various statutory powers to secure the protection of listed buildings, including, as a last resort, compulsory purchase at minimal value if a building is deliberately neglected. The Council will keep under review the desirability of using these powers in order to secure the protection of these important buildings.

4.56 The test of substantial harm to registered parks and gardens is based on Historic England advice.

4.57 Bexley maintains an active list of over 400 buildings and structures of local historic value, which contribute significantly to the character of the borough. Whilst these have no statutory protection, the Council recognises their importance and will seek their retention. The Local List is actively kept under review. Residents, local amenity groups, and other stakeholders can nominate additions or deletions to the Local List at any time, which triggers a case-by-case basis review of the particular building. Further information can be found on the Council's website.

4.58 The primary heritage consideration for applications for development affecting a locally listed building is how it will be viewed from the public realm and how it will contribute to the streetscape. Particular care should be paid to the impact of external alterations. The Council will strongly encourage the protection of internal features where they contribute to the structure's designation.

4.59 The Council will continue to monitor loss of the borough's non-designated heritage assets through demolition. These assets are important within a local context and their long-term retention a priority. The Council will consider additional measures to provide protection for buildings and structures which appear on the Council's Local List. This includes the introduction of an 'Article 4 Direction.'

4.60 Alterations or extensions to buildings within conservation areas should respect the design, scale and materials of the original building and harmonise with the location. Any proposals will be assessed on the extent to which they respect and respond positively to the character or appearance of the area. Not all elements of a conservation area contribute to its significance; sometimes high-quality new developments or replacement or alteration of existing buildings can enhance a conservation area. The Area Appraisal and Management Plan documents set out guidance on these issues for each of the borough's conservation areas.

4.61 Applications for development which involves ground works in APAs in Tiers 1-3 must be accompanied by an archaeological desk-based assessment and, where appropriate, field evaluations to demonstrate that potential impacts of proposed development on archaeological significance have been fully considered. All land outside APAs is treated as being in Tier 4 but major developments in these areas sometimes require the same archaeological evidence as higher tiers.

4.62 The design of development should make provision for incorporation, safeguarding and preservation in situ of archaeological remains wherever possible and there will always be a presumption in favour of the retention of nationally important archaeology in situ. Where we agree that conservation of archaeological remains in situ is impossible or deposits are of lesser significance, investigation, recording and an appropriate level of publication and archiving will be required.

5. Bexley's wellbeing: providing community facilities and enhancing our environment

Related Council overarching strategies

#BrilliantBexley
Bexley Growth Strategy
Connected Communities Strategy
Start Well, Live Well and Age Well (Bexley System-wide Prevention Strategy)

5.1 The Council is actively promoting a positive state of health and wellbeing for residents in the borough. Start well, live well and age well, Bexley's system-wide prevention strategy, states that:

> "*The decisions we make locally to shape Bexley as a place will have a significant impact on the environment and the choices people make. Considering health and wellbeing in the policy making process helps broaden the reach of prevention, from transport to planning and leisure, to housing, environmental health, education and social care.*"

5.2 To support the creation of sustainable, healthy and inclusive communities, the Council has taken into consideration the amount of development proposed, the type of development, its distribution around the borough, and when it is expected to be built.

5.3 However, directly related to this is the impact new residential development will have on existing social and community infrastructure. The capacity of the existing services and facilities will be assessed to determine whether an increase in population from the new development can be accommodated, or, if more services and facilities are needed, whether they should be expanded, or new provided.

5.4 The policies in this chapter focus on ensuring that development in the borough both contributes to the provision of, as well as the protection and enhancement of, community services and facilities, green and blue infrastructure, and the ecology of the borough. Specific infrastructure projects are identified in the Infrastructure Delivery Plan, which supports growth set out in the local plan.

5.5 The link between human wellbeing and nature is well demonstrated. The wider network of green spaces that are included within social and community infrastructure provides benefits which contribute to the quality of life of residents. These areas balance the built environment and help enhance a sense of place, providing a focal point for healthy exercise, community interaction and food-growing. Key features of good design include walkable space, community space, and greenspace. These spaces increase physical activity, encourage social interaction, mitigate pollution and therefore support health and mental wellbeing.

5.6 The quality of Bexley's environment is determined by how ongoing growth and development can be balanced with the sometimes conflicting need to manage the borough's ecology. Some of the adverse effects of the built environment, such as the urban heat island effect and increased risk of flooding, can be mitigated by the presence of nature.

5.7 Understanding the level of people's access to nature and ensuring the protection of the highest quality natural habitats are fundamental. A high level of biodiversity is generally considered to be desirable for a number of reasons, including species retention, environmental quality, mental health and child development – in other words, quality of life.

SP7: Social and community services and facilities

Related plans, strategies and key evidence – why we need this policy

Bexley Joint Strategic Needs Assessment
Bexley Commissioning Plan for Education Provision
Infrastructure Delivery Plan (IDP)
Bexley Green Infrastructure Study
Community Infrastructure Levy
Planning Obligations Guidance SPD

5.8 Social and community infrastructure help to create and maintain strong, cohesive, healthy and sustainable communities. These are the facilities and services and accessible open spaces that provide for the needs of Bexley's residents, of all ages and abilities. They can act as focal points for new and existing communities and can help to give an area a sense of identity.

5.9 The Infrastructure Delivery Plan (IDP) sets out the measures that will accommodate the growth in this respect. It is important that the right level of provision of social and community infrastructure is in place when it needs to be, suitably located either in town centres with good public transport or embedded within the residential areas that they serve.

5.10 The Bexley Green Infrastructure Study includes an assessment of both current and future need for open spaces and playing pitches. The playing pitch audit provides an assessment of the existing sports pitches and facilities, whilst identifying opportunities for retaining, reducing or removing this provision and prospects for new provision and partnerships. The open space assessment provides an understanding of deficiency and need in terms of quantity, quality/value and accessibility. This is a fundamental piece of evidence informing future need in the borough.

5.11 The policy sets out how the Council will plan and monitor growth in terms of its impact on social and community services and facilities. Any development generating additional demand for infrastructure should appropriately contribute to meet the associated increase in demand. It will also be important to ensure that the provision of social and community facilities continues to reflect the needs of a changing and diverse population, in the most appropriate locations.

SP7 Social and community services and facilities

1. The Council will ensure the identification, development, completion, safeguarding and monitoring of services, facilities and open spaces of the types set out in Table 10 that are required to support housing and employment growth in the borough so as to make a positive contribution to creating strong, cohesive and sustainable communities. This will be achieved through:

   a) addressing the needs of existing and future residents, of all ages and abilities, by ensuring the protection and improvement of existing services, facilities and open space and the creation of new services, facilities and open spaces where they are needed, in accessible locations if possible, including town centres, with good transport connectivity;

   b) working with partners such as the Mayor of London, Crossrail Limited, utility companies, developers, registered social housing providers, the NHS, voluntary sector, other Council departments and/or adjacent boroughs to develop, integrate, implement and monitor relevant social and community projects and programmes, particularly in the borough's identified sustainable development locations; and,

SP7 Social and community services and facilities

c) ensuring developers contribute to the reasonable costs of new and expanded services, facilities and open spaces made necessary by their development proposals through the use of planning obligations and/or the community infrastructure levy.

Types of social and community infrastructure

Category	Examples of types of social and community services and facilities
Health	primary and secondary health care including mental health; hospitals; GPs, dentists and pharmacies
Education	early years provision, primary, secondary, and further and higher education including adult learning and school playing fields
Emergency	police and judicial facilities, ambulance services, fire brigades and any lifeboat or river rescue requirements along the borough's navigable rivers
Neighbourhood	local shops (under 280m^2), community centres, halls and meeting places; youth, children and family services; play and informal recreation facilities; facilities for the elderly and disabled; public houses that are designated as assets of community value; public toilets and Changing Places facilities; water fountains, civic spaces and accessible open spaces
Leisure	libraries; sports; leisure; recreation; arts; theatres; places of worship; heritage and visitor attractions
Urban open space	predominantly open-air recreation, leisure, community activities, tourism, sport and physical activity, including playing pitches; allotments and nursery gardens; cemeteries; nature conservation; and educational or community uses in large grounds

Table 10: Types of social and community infrastructure

Policy implementation

5.12 For the purposes of policies in this Local Plan, the categories of types of social and community services and facilities are set out in Table 10, with examples of each type included. It is important to note that this is not an exhaustive list, as there may be additional services or facilities arising from development that could fit into one or more of the six categories listed above.

5.13 Education Land and Urban Open Space are formal land use designations that are defined on the submission policies map. The Education Land designation includes only primary and secondary schools which form part of the Council's statutory responsibility with regards to schools and school admissions. Other types of educational facilities listed in Table 10, whilst not included in the land use designation, are nonetheless protected under policies SP7 and DP15.

5.14 The types of social and community infrastructure listed are those that offer a general public benefit. These would normally be (but are not limited to) publicly funded or subsidised services and facilities that are universally available. Individual proposals for new, or expansion of existing, social and community facilities will be considered by the Council on a case by case basis.

5.15 Major developments will be expected to accommodate new social and community infrastructure as part of mixed-use proposals where practical and feasible or contribute to the expansion of existing

infrastructure in order to increase the capacity of the facility to serve the development, particularly where a deficiency is identified though the IDP or Bexley Green Infrastructure Study.

5.16 It is important to note that Changing Places facilities for severely disabled people are now compulsory in new or major refurbished public buildings, specifically places of assembly, recreation and entertainment with a capacity for 350 or more people, as set out in the Building Regulations 2010.

5.17 Development proposals in locations where new infrastructure is planned must also be compatible with and provide the necessary safeguards for, and network links to, the future community infrastructure project as appropriate.

5.18 The IDP provides more detail on social and community infrastructure requirements and demonstrates how the Council will work with partners to identify any gaps in provision and how these gaps can be addressed. Through the IDP, the Council will regularly monitor the amount of growth in Bexley, and any potential impact on services, so that the long-term delivery of sustainable development can be achieved.

5.19 Where there are services and facilities that have existing deficiencies or gaps in their services and funding, the Council will continue to work with these partners to ensure that the critical infrastructure and services to support new development are provided. In addition to statutory provides, the voluntary sector also takes an active role in the planning and delivery of services in Bexley, coordinated through BVSC, the Council for Voluntary Service (CVS) set up to offer support to Bexley organisations and residents.

5.20 The IDP will be regularly updated by the Council to ensure this is a working document. The IDP is a living plan, which will be subject to national, regional and local priorities. It will need to be adapted where lead delivery agencies may change their responsibilities, or where any shortfall in funding is secured sooner than anticipated.

5.21 Where possible the Council will make sure necessary improvements to infrastructure are made a priority as funding opportunities and investment programmes come forward, which will help to provide a more sustainable, inclusive and healthier community. The Council will also ensure that a process and timetable for delivery of infrastructure remains in place and that contributions are monitored and distributed as developments are implemented.

5.22 The Community Infrastructure Levy and the Planning Obligations Guidance SPD will be kept under review to ensure infrastructure delivery meets Local Plan growth requirements and to accommodate any changes to the national and regional framework in this respect.

➲ DP15: Providing and protecting social and community infrastructure

Related plans, strategies and key evidence – why we need this policy

Bexley Joint Strategic Needs Assessment
Bexley Commissioning Plan for Education Provision
Bexley Green Infrastructure Study
Infrastructure Delivery Plan (IDP)

5.23 Chapter 8 of the NPPF sets out requirements for planning policies to promote healthy, inclusive and safe places. This includes providing, and preventing the unnecessary loss of, the social, recreational, play and cultural facilities and services the community needs. Paragraph 94 of the

NPPF gives great weight to the need to create, expand or alter schools to ensure that there is a choice of school places available to meet need and paragraph 97 sets out the requirements for protecting existing open space, sports and recreational buildings, including playing fields..

5.24 Social and community infrastructure comprises many different types of services and facilities, including health, education, local shops, social services, leisure, heritage, culture, open space, play space and the public realm, all of which are vital to the identity and function of the borough, as well as its attractive and distinctive character. It is essential that this is maintained and enhanced so that the borough retains its diversity and vitality.

5.25 Open space is included in the types of social and community infrastructure as it is important to health and wellbeing through its contribution to the landscape and in providing attractive breaks in the built-up area.

5.26 Larger open spaces are important because they accommodate a wide range of open-air recreational, play, leisure, educational, institutional and other uses within easy reach of residential areas. And smaller open spaces, particularly if they are enclosed by buildings along several edges, can provide a respite from the built form of the borough. Once open land is built on it is lost forever and a positive benefit must be demonstrated for it to be developed.

DP15 Providing and protecting social and community infrastructure

Providing

1. Proposals for new social and community infrastructure (as set out in Table 10 above) or for the enhancement or expansion of existing infrastructure will generally be supported, particularly the provision of health, physical activity, leisure, education and children and young people's facilities. In all cases, proposals should be:
   a) sustainably located, ideally close to the local community the facility is intended to serve, or within areas of good access to public transport, such as town centres, particularly where the proposal is likely to generate a significant volume of traffic;
   b) easily accessible to all by a range of sustainable travel modes, including walking, cycling and public transport;
   c) of an appropriate character, size and scale to meet the needs of the community; and,
   d) designed to be as flexible, adaptable and capable of multi-use as possible.
2. Proposals for education (including early years) facilities and places of worship should provide a Travel Plan to assess any traffic issues and ways to resolve these as a result of the development
3. Proposals for new or expanded Education facilities should be designed to reflect the community needs assessments.
4. Proposals need to demonstrate that they are supported by the relevant service provider.
5. The creation of F.2(a) small walk-to convenience shops (that do not exceed 280m^2 gross in total) should be provided in new larger residential developments where there is no convenience shop within 1,000 metres walking distance to the site.

Protecting

6. The Council will not permit the loss of existing social and community infrastructure types included in Table 10, or defined on the submission policies map as Education Land, except where:

DP15 Providing and protecting social and community infrastructure

a) it can be demonstrated that there is no current or future need for the existing premises or land for any community use (or specifically for educational use where the land is designated as Education Land) and that it no longer can serve the needs of the community; or
b) alternative community facilities for the specific end user that meet current or future needs are provided within the relevant area; or,
c) it is part of an agreed strategy or programme of estate management.

7. For urban open space, it must also be demonstrated that the land has no visual amenity value as a landscape feature in providing breaks in the built-up area.

8. Changes of use from individual F.2(a) convenience shops will only be permitted where it can be demonstrated that an alternative convenience shop is available within reasonable walking distance from the existing unit.

Policy implementation

5.27 The Council is supportive of development proposals for the provision of new social and community infrastructure or for the enhancement or expansion of existing infrastructure, where the need exists. This policy encourages all available facilities to be used to their full potential, provided that it is within safe, accessible and appropriate environment for the activity taking place.

5.28 This is especially true of proposals that enable the multiple uses of facilities i.e. the sharing of facilities, equipment or resources across different sectors of the community. Multi-use social and community infrastructure offers local communities increased opportunities to access a wider range of facilities in the local area and can help to improve health, social and cultural wellbeing.

5.29 This policy applies to social and community infrastructure listed in Table 10. The types of social and community infrastructure listed are those that offer a general public benefit. These would normally be (but are not limited to) publicly funded or subsidised services and facilities that are universally available. Individual proposals for new, or expansion of existing, social and community facilities will be considered by the Council on a case by case basis.

Providing

5.30 Existing facilities may need to be extended or upgraded so that they are adaptable and able to meet the changing needs of the borough's population. Existing services should be maintained whilst the upgrade or replacement is taking place. New development can provide the opportunity to facilitate this.

5.31 Changing Places facilities for severely disabled people are now compulsory in newly built and major refurbished places of assembly, recreation and entertainment with a capacity of 350 or more people, in line with the Building Regulations 2010.

5.32 Social and community infrastructure should be provided within easy reach by walking and public transport for the community that they serve. This is particularly important for facilities attracting large numbers of people or drawing users from a wider catchment area, which should be located in sustainable, accessible locations, ideally using existing vacant community facilities.

5.33 Generally, town centres are the most accessible locations in the borough, although it is recognised that some social and community infrastructure is not required to be located in areas of good connectivity to public transport, for example emergency services or early years provision.

5.34 The provision of new and/or enhanced infrastructure should be designed to meet the needs of their intended occupants, taking into account any appropriate regulations and national design and space standards, including disabled access.

5.35 Larger residential developments where the creation of walk-to convenience shops is encouraged are considered to be 300 homes or more.

5.36 Proposals for new and refurbished play and informal recreation facilities will be supported to address the identified deficiency in the Bexley Green Infrastructure Study. These will be expected to follow the standards identified in the Mayor's Shaping Neighbourhoods: Play and Informal Recreation planning guidance.

Protecting

5.37 In order to demonstrate that there is no current need for the existing community facility, evidence will be required, such as a record of attempts to market the premises/land for the existing use with an appropriate property agent on reasonable terms for at least 18 months or, in the case of a local convenience shop, at least 12 months. Vacancy in itself will not be sufficient evidence.

5.38 Proposals resulting in the loss of sports pitches and facilities, including those associated with schools, or open spaces need to demonstrate that they have met the requirements of paragraph 97 of the NPPF including that the loss will be replaced elsewhere if needed. The Bexley Green Infrastructure Study findings should inform the assessment and development proposal. The study should also be used to help address the requirements set out within London Plan Policies S5 Sports and recreation facilities, and G4 Open space.

5.39 The types of uses that are considered to retain the open appearance of Urban Open Space include, but are not limited to: predominantly open-air recreation, leisure, community activities, tourism, sport and physical activity; allotments and nursery gardens; cemeteries; nature conservation; children and young people's play facilities, and educational or community uses in large grounds.

5.40 Where land designated on the submission policies map as Urban Open Space (UOS) is no longer needed for its use, the Council will favour alternative uses that would retain the generally open appearance of the land.

5.41 An estate management programme or strategy would normally be prepared by a registered provider of social housing for the redevelopment of large housing estates and should be submitted alongside development proposals to demonstrate changes to existing services and facilities.

5.42 Protecting local shops will ensure that existing local convenience shops (defined by the Use Class Order as F2(a)) located outside of the designated centres and neighbourhood parades continue to serve local communities. A convenience shop is considered to sell everyday items such as food, drinks, and household items, and should be at least one full width shopping frontage (minimum of five metres).

DP16: Health impact assessments

Related plans, strategies and key evidence – why we need this policy

A Health and Wellbeing Strategy for Bexley
Start Well, Live Well and Age Well (Bexley System-wide Prevention Strategy)
Bexley Obesity Strategy
Bexley Joint Strategic Needs Assessment
Connected Communities Strategy

5.43 Generally, Bexley has a healthy community, and this is demonstrated through local residents living longer on average and enjoying more years without illness or disability than the London and England population.

5.44 Despite the relatively positive health situation, people living in more disadvantaged areas of the borough tend to exhibit poorer health characteristics. For example, they are more likely to suffer chronic ill health and die younger. It is essential that health inequalities – and the social, environmental and economic factors that contribute to them – are taken into account.

5.45 This policy ensures development contributes towards a healthy built environment in accordance with the London Plan and the aims and objectives set out in this Local Plan and other key Council plans and strategies by providing a framework for assessing proposals.

5.46 Health Impact Assessments (HIAs) provide a systematic approach for assessing the potential impacts of development on the social, psychological and physical health of communities. HIAs are designed to consider whether: a development proposal might reinforce health inequalities and inadvertently damage people's health; or, have positive health outcomes for the local community. Ensuring issues, and opportunities, are considered at an early stage in developing planning proposals can help improve both the physical and mental health of the population.

DP16 Health impact assessments

1. The following types of development are required to complete and submit a desktop health impact assessment checklist as part of the planning application:
   a) major developments; and,
   b) development proposals that contain any of the following uses:
      i. hot-food takeaways;
      ii. betting shops
      iii. education facilities;
      iv. health facilities;
      v. leisure or community facilities; and,
      vi. publicly accessible open space.

2. Development proposals of a scale referable to the Greater London Authority are required to have a completed detailed health impact assessment, submitted as part of the planning application. The assessment will be expected to include details of engagement undertaken with local health and community stakeholders and how their input has influenced the proposals.

Policy implementation

5.47 The scope of an HIA will vary depending on the size of the development and its location. The HIA should identify the likely health impacts of the development and include measures to improve health outcomes and address negative effects and inequalities. HIA can be undertaken as a stand-alone assessment or, for relevant applications, as part of a wider Environmental Impact

Assessment. Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development wherever the opportunities arise.

5.48 In order to mitigate any potential negative impacts, HIAs should be undertaken for hot food takeaways and betting shops. To maximise potential positive impacts, and help reduce health inequalities, HIAs should be undertaken for social and community infrastructure.

5.49 The London Healthy Urban Development Unit (HUDU) provides guidance on Health Impact Assessments. A desktop health impact assessment should use HUDU's Healthy Urban Planning Checklist to identify the key issues and impacts and when they are likely to occur.

5.50 The checklist aims to ensure a development proposal is as 'healthy' as possible, by achieving as many 'Yes' ticks and avoiding 'No' ticks. A 'No' gives a warning that an aspect of a development may need to be reconsidered. Actions should be identified to enhance the positive impacts and mitigate the negative impacts. Local circumstances may justify why a scheme cannot meet the expected standard.

5.51 Developments of a scale referable to the Greater London Authority will be expected to complete a more extensive full health impact assessment in accordance with the guidance from HUDU.

➲ DP17: Publicly accessible open space

Related plans, strategies and key evidence – why we need this policy

A Health and Wellbeing Strategy for Bexley
Start Well, Live Well and Age Well (Bexley System-wide Prevention Strategy)
Bexley Obesity Strategy
Bexley Joint Strategic Needs Assessment
Connected Communities Strategy
Bexley Green Infrastructure Study

5.52 Open and green spaces are important for promoting health and wellbeing. Safe and high-quality publicly accessible open space plays a vital role in improving a number of aspects of people's mental and physical health and wellbeing as well as various social and environmental indicators.

5.53 The Council has undertaken an assessment of open space as part of its Bexley Green Infrastructure Study, which includes an assessment of deficiency illustrated by Figure 6. As well as providing new areas of open space, Bexley's open space deficiency areas can sometimes be improved through enhanced public access to existing open space. Although a new development may be located very close to an open space, if there is no direct public walking route provided then the open space may provide little benefit to the residents of the new development.

DP17 Publicly accessible open space

Maximising access to existing open space

1. In order to maximise access to existing publicly accessible open space, new developments will be required to:
   a) provide new or improved access to adjacent or nearby publicly accessible open space, where appropriate;
   b) not block or hinder existing public access, unless suitable alternative access is provided; and
   c) promote publicly accessible open spaces as multi-functional spaces that cater for a range of activities, lifestyles, ages and needs.

DP17 Publicly accessible open space

Provision of new open space

2. New open space provided as part of a development should be inclusive and highly accessible to residents of the development and surrounding areas.

Areas deficient in publicly accessible open space

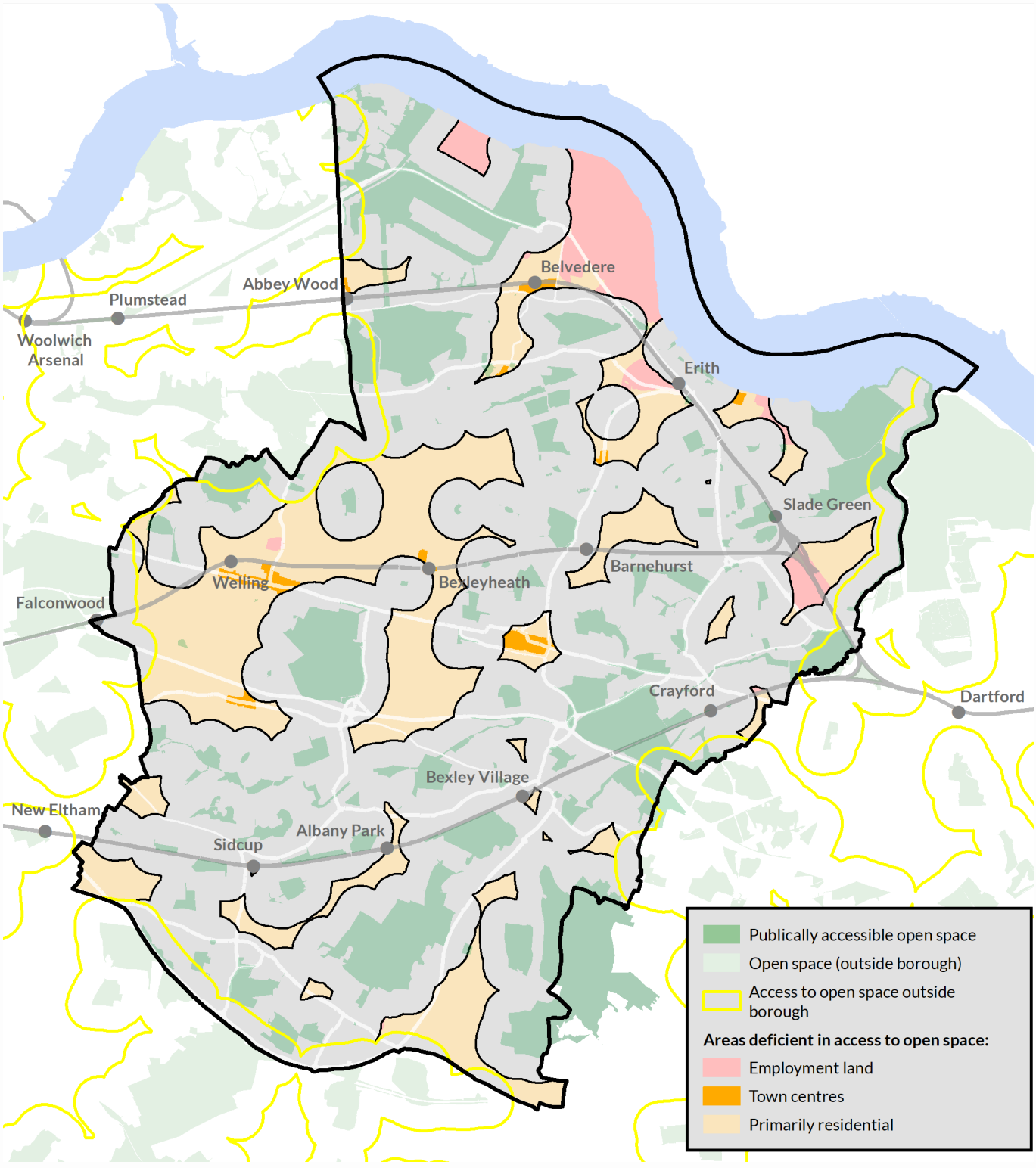


Figure 6: Open space deficiency across the borough

Policy implementation

5.54 New or improved access can decrease the practical walking distance from an existing open space that may have previously only been accessible by car or public transport. By making it easier for pedestrians to cross barriers or walk along newly created routes, open space deficiency in the borough can be reduced.

5.55 A suitable alternative access is considered to be one that does not increase existing walk times from the open space to the residential community that it serves and to nearby public transport.

5.56 This policy promotes innovative approaches to delivering new open spaces as well as locating parks in areas of the borough where accessibility to public open spaces is poor by creating smaller open spaces e.g. pocket parks, which could play a vital role in increasing accessibility.

5.57 Rivers and waterways fall under the definition of open space and it will be vital that new development alongside these spaces either maintains existing access or provides for new access, including waterside walks.

SP8: Green infrastructure including designated Green Belt

Related plans, strategies and key evidence – why we need this policy

National Planning Policy Framework
The London Plan 2021
Bexley Green Infrastructure Study

5.58 The term green infrastructure refers to the network of all green and open spaces and includes Bexley's waterways. Some green spaces may have buildings and other development within them, particularly schools and other community facilities in large open grounds.

5.59 The primary function of Metropolitan Green Belt is to serve as a break between settlements. Metropolitan Open Land functions similarly, but as a break within a built-up area rather than at the edge. Both of these land use designations are strongly protected from development.

5.60 Green infrastructure is a multifunctional network that will secure benefits including, but not limited to, biodiversity; natural and historic landscapes; culture; building a sense of place; the economy; sport; recreation; local food production; mitigating and adapting to climate change; water management; and the social benefits that promote individual and community health and wellbeing. Public realm includes the parts of the borough, whether publicly or privately owned that are available without charge for everyone to use, including parks, squares and streets.

5.61 Green infrastructure assets identified within Bexley include: open spaces such as parks and gardens, natural and semi-natural green spaces, linear open spaces, amenity green spaces, allotments and community gardens, cemeteries and churchyards, play spaces; playing pitches and other outdoor sports spaces; development greening features such as green roofs and walls covered in plants; small pocket parks, domestic gardens, the borough's network of trees, street trees and ancient woodland; rivers and waterways; along with strategic green wildlife corridors, footpaths and cycleways that connect them. The Bexley Green Infrastructure Study sets out the hierarchy of open spaces.

5.62 Bexley is one of London's greenest boroughs. Its parks and open spaces are central to the character and identity of the borough. The network of open spaces totals some 1,253 hectares (excluding sites that are primarily used for outdoor sports provision). Of this, 1,099 hectares is publicly accessible.

5.63 The Southeast London Green Chain forms part of a virtually continuous arc of public and private open spaces, largely in recreational use, that extends through the borough of Bexley, Bromley, Lewisham and Royal Greenwich.

5.64 A number of Bexley's parks are listed on Historic England's Register of Parks and Gardens of Special Historic Interest in England, and five open spaces contain listed buildings, including Danson Park at Bexleyheath and Hall Place and Gardens at Bexley.

5.65 The River Thames forms the northern boundary of the borough and the Cray and Shuttle rivers also flow through Bexley. These river corridors are important defining features of the borough's landscape and views. Waterways are rich sources of biodiversity and archaeology. A number of waterways cross or originate within the borough.

5.66 National and regional policy seek to contain development to previously developed land and protect open spaces. This policy approach addresses open space deficiencies and ensures that Bexley remains a 'green' borough, well served by a network of high-quality, safe and accessible open spaces, offering a range of opportunities and providing attractive relief to the built form.

SP8 Green infrastructure including designated Green Belt

The Council's commitments to creating a multifunctional network

1. Bexley's green infrastructure, including open spaces and waterways will be protected, enhanced, restored and promoted as valuable resources to provide a healthy integrated network for the benefit of nature, people and the economy. Future development must support the delivery of a high quality, well connected and sustainable network of open spaces. In particular, this will be achieved by:
   a) protecting Metropolitan Green Belt and Metropolitan Open Land from inappropriate development;
   b) encouraging beneficial use of Metropolitan Green Belt such as opportunities for public access, outdoor sports and recreation, retaining and enhancing landscapes, visual amenity, biodiversity or to improve damaged and derelict land;
   c) resisting harmful development of gardens and other green amenity spaces;
   d) keeping under review existing allotments and encouraging provision of space for community gardening, including for food growing, within new developments;
   e) working in partnership, seeking funding and supporting projects to promote the restoration and enhancement of open spaces, public realm and the waterway network within the borough;
   f) implementing the priorities outlined in relevant borough strategies or studies on open space, green and blue infrastructure including, where appropriate, rivers and waterways restoration;
   g) supporting the role waterways can play as tools in place making and place shaping, contributing to the creation of sustainable communities;
   h) protecting land that forms part of the Southeast London Green Chain, including the Green Chain Walk, seeking to improve public access to and through the area, and promoting it as a recreational resource and visual amenity;
   i) supporting the creation of new cycling and walking routes to connect publicly accessible open spaces to main destination points, such as town centres, public transport hubs, community facilities, and other publicly accessible open spaces;
   j) ensuring all new developments deliver a net increase to green infrastructure;
   k) seeking opportunities in new development, where appropriate, to provide new open space, play space and/or public realm, either through direct provision of new open space or improvement of existing open space through planning obligations;
   l) protecting new, or existing, amenity space that has been provided as part of a development, including incidental green spaces that add amenity value;

SP8 Green infrastructure including designated Green Belt

m) protecting and enhancing the biodiversity, heritage and archaeological values of open spaces, including the Thames, Cray and Shuttle rivers and their tributaries within the borough;
n) using water spaces for transport, cultural, recreational and leisure activities and other water-related uses;
o) providing opportunities within waterside development for river and waterway restoration and the protection and enhancement of biodiversity;
p) protecting green wildlife and ecological corridors, seeking opportunities to increase connectivity between the network of green spaces and habitats to enhance biodiversity and promote accessibility wherever appropriate; and,
q) seeking opportunities to support the functions and drivers for green infrastructure, such as using good urban design to reduce air pollution, integrating green infrastructure into development where there are opportunities to mitigate poor air quality on a local scale.

Policy implementation

5.67 National, regional and local formal land use designations for green infrastructure are identified on the submission policies map. These include: Metropolitan Open Land (MOL); Metropolitan Green Belt; Urban Open Space; Southeast London Green Chain; Sites of Special Scientific Interest (SSSIs); Regionally Important Geological Sites (RIGS) and Locally Important Geological Sites (LIGS); Local Nature Reserves; and Sites of Importance for Nature Conservation (SINC).

5.68 The areas designated as Metropolitan Green Belt (MGB) and Metropolitan Open Land (MOL) play a variety of important functions in Bexley. As well as providing open expanses, these protected designations have high levels of nature conservation, landscape, recreation and historic value.

5.69 The Metropolitan Green Belt also provides the vital function of containing the further expansion of built development. The quality and character of these areas are deserving of protection and enhancement, both for local residents and visitors. Inappropriate development, as defined by Government guidance, will be resisted, unless very special circumstances apply.

5.70 New developments have an important part to play in the protection and enhancement of Bexley's open spaces and waterways. This includes contributing towards open space provision, making a positive contribution to green infrastructure and the public realm, and enhancing biodiversity. Open spaces also have a significant positive impact on health and wellbeing.

5.71 There are parts of the borough that are deficient in access to open space, as illustrated by Figure 6. New development in these areas can contribute by providing new publicly accessible open space, or better access to existing open space.

5.72 The Council seeks the enhanced provision for biodiversity in open spaces and identifies local quality and accessibility standards. Partnership working and using funding opportunities to support projects will provide opportunities to protect and enhance Bexley's open spaces and waterway network.

5.73 The London Plan sets requirements for play space provision and local guidance will be set out in the Design Guide SPD. Where it is not possible to provide new open space and/or play space provision, many new developments will have the potential to contribute to green infrastructure and the public realm, including through the use of planning obligations.

5.74 When seeking open space and play space opportunities in new development, the Council will have regard to its green infrastructure, open space, indoor and outdoor sports facilities and recreation studies. The strategies developed from these studies will set a framework for the future planning and management of open spaces, outdoor sport and recreation facilities by encouraging developers, Council services and other partners to plan for the future delivery and implementation of open space improvements.

➲ DP18: Waterfront development

Related plans, strategies and key evidence – why we need this policy

Environment Agency – Thames Estuary 2100 Plan (TE2100 Plan)
Marine Management Organisation – Draft South East Marine Plan Documents
Port of London Authority – Vision for the Tidal Thames
Bexley Green Infrastructure Study
Strategic Flood Risk Assessment, Levels 1 and 2

5.75 The River Thames and the River Cray are part of the Mayor of London's Blue-Ribbon Network, where development to increase use for transport, sport and leisure activities, particularly in areas of deficiency, is supported. Waterside development will be expected to have particular regard to the contribution that could be made by the waterway network.

5.76 Water spaces play an important role within the borough, supporting ecosystems, providing open space, residential moorings and providing transport networks. Waterways are valuable public assets, contributing to the borough's cultural and built heritage and encouraging physical and healthy outdoor activities which are essential to our health and wellbeing.

5.77 Within Bexley, there are a number of watercourses including the Rivers Cray and Shuttle. The River Thames flows along the north of the borough, and the River Darent along the northeast. Additionally, there is a network of lakes, canals, smaller streams, dikes and ditches within the borough and 'lost rivers' such as the Wansunt and Stanham that now run in tunnels beneath Crayford.

DP18 Waterfront development

1. All development proposals adjacent to rivers and other watercourses such as lakes, ditches and dikes will be required, where appropriate, to:

   a) activate space to and along the waterfront;
   b) maintain existing public access to and along the water and/or provide new access to and along the water where none exists;
   c) create residential moorings and visitor moorings to accommodate suitable vessels;
   d) enhance the appearance and quality of the water space including:
      i. de-culverting watercourses and naturalising the river channel where practical;
      ii. using green infrastructure to improve water quality where possible;
      iii. improving nature conservation value for wildlife;
      iv. improving visual connections with important features, considering the design and landscaping of the adjacent area; and
      v. preserving the openness and character of the water spaces.
   e) provide suitable setbacks from water space edges to mitigate flood risks and to allow waterside walkways and cycle paths;

DP18 Waterfront development

f) improve river walls and embankments, taking into account sea level rise, and/or fluvial, ground water and surface water flood risks;
g) promote safety along the water's edge, including the provision of riparian lifesaving equipment; and,
h) avoid the loss of water spaces.

2. Development proposals should not adversely affect:

a) the integrity of the waterway structure;
b) the quality of the water;
c) levels of pollution due to unauthorised discharges and run off or encroachment;
d) the landscape, heritage, ecological quality or habitat continuity and character of the waterways;
e) the waterway's potential for being fully unlocked; or
f) the use of the waterway network.

Policy implementation

5.78 Applicants submitting proposals for waterfront development have obligations, as riparian owners, to maintain watercourses that are on, under or on the boundary of their site. Restoration and/or improvement of walls and embankments of main rivers should be carried out in liaison with the Environment Agency. The Environment Agency requires undeveloped setbacks alongside fluvial rivers of 8 metres and 16 metres from tidal rivers to provide access in order to maintain walls and embankments. Ordinary watercourses maintenance should be carried out in liaison with the flood risk management authority.

5.79 Bexley's waterways provide or have the potential to provide various benefits including environmental and ecological health, transport, heritage, sport and recreation, and amenity. The opportunity to enhance the quality of the built and natural environment should be taken through positive incorporation of waterways into development proposals. With careful design, the outlook onto these biodiversity rich areas will be enhanced.

5.80 The watercourses in Bexley are a unique aspect of the borough, many of which are designated Sites of Importance for Nature Conservation. Consideration must be given as to how they can be positively incorporated, maintained and enhanced as part of any future development.

5.81 Restoration of the river walls, embankments and wharfs should be designed to improve their biodiversity value, taking into account sea level rise, or, in the case of fluvial rivers, surface water and ground water flooding. Plans for future updates to defences should be designed into waterfront development plans and local masterplans and incorporate green infrastructure and placemaking.

5.82 Development proposals for riverside sites and existing parks and open spaces should investigate the potential for full or part realigned flood defences prior to commencement of site planning. All existing access points to riverside paths should be safeguarded and opportunities for new access points considered, particularly if there are no access points nearby.

5.83 Developments must take into account future flood defence improvement needs and maintenance access as part of waterfront development plans. Considerations of the retention of access for long-term maintenance and upgrades to the flood defences should be factored in. Surface water discharge to existing canal and lakes systems should be prioritised over sewage discharge, where sufficient capacity exists or can be created.

5.84 Habitats that naturally provide flood defences and carbon sequestration should be protected and where possible, enhanced. Setting back defences could reduce the dependence on vertical walls and provide opportunities for sloping riversides and public amenity areas.

5.85 Developments adjacent to waterways should facilitate the safe and active use of the water space, including the provision of riparian lifesaving equipment, such as grab chains, access ladders and life buoys along the riverside, along with the incorporation of suicide prevention measures in appropriate locations, such as CCTV and signage with information to access support. The Port of London Authority provides guidance on standards and best practice in its A Safer Riverside document.

5.86 Pollution of the waterways must be avoided. Methods to avoid polluted runoff, for example from petrol chemicals and salts into waterways, need to be considered in planning applications adjacent to waterways.

➲ DP19: The River Thames and the Thames Policy Area

Related plans, strategies and key evidence – why we need this policy

Environment Agency – Thames Estuary 2100 Plan (TE2100 Plan)
Marine Management Organisation – Draft South East Marine Plan Documents
Port of London Authority – Vision for the Tidal Thames
Bexley Green Infrastructure Study
Strategic Flood Risk Assessment, Levels 1 and 2

5.87 This policy sets out the development management considerations that relate to the nature conservation interest and quality of the River Thames, which is a strategically important feature of London, and to the special character of Bexley's blue infrastructure.

5.88 The River Thames, London's most famous natural feature, has several important functions to play in the borough in terms of potential contribution to transport, contribution to nature conservation interest, flood defence, archaeology and other heritage assets.

5.89 The River Thames creates a wildlife corridor running right across the capital, and is extremely important for species such as fish, birds and bats. It is a designated Site of Importance for Nature Conservation of Metropolitan Importance and an Area of Archaeological Priority. These interests should be protected and enhanced by new development.

DP19 The River Thames and the Thames Policy Area

1. The Thames Policy Area is defined on the submission policies map.

2. Development proposals for riverside sites and existing parks and open spaces should investigate the potential for full or part realigned flood defences prior to commencement of site planning, and are required to:

   a) follow the strategies for water management set out in the TE2100 Plan and subsequent updates;
   b) enhance the relationship between the development site and the Thames; and,
   c) contribute to the completion of the Thames Path, a continuous public riverside footpath and cycleway, including safeguarding existing or providing new access points to the riverside path.

3. The Council encourages improving the efficiency and promoting the sustainability of waterborne freight movements, including waste transfer and aggregates handling, on the Thames. Viable wharves are safeguarded for such uses through a Direction by the Secretary of State.

DP19 The River Thames and the Thames Policy Area

4. Proposals in the Thames Policy Area should pay attention to their impacts on the ecology of the River Thames, and on its priority habitats and protected species. Ecological enhancements will be sought from all proposals; development directly adjacent to the River should look to enhance essential fish habitats and reduce the risk of invasive species.

5. The Council will encourage improved access to nature across the Thames Policy Area. Opportunities should be sought to link proposed and existing wildlife corridors, including the Ridgeway Link, Thames Marshes corridor, Thamesmead Link and the River Thames itself, and integrating these networks with pedestrian and cycle paths where appropriate.

6. Habitat creation and enhancement will be promoted. Opportunities should also be sought for related enhancements to visitor's centres and other facilities. Habitat creation along the Thames should aim to improve the area's flood resilience and water management.

Policy implementation

5.90 Development within the Thames Policy Area (as defined on the submission policies map) should consider the most up to date relevant published guidance. Strategies for water management are set out in the Environment Agency's Thames Estuary 2100 Plan (TE2100 Plan).

5.91 Developments along the Thames should incorporate flood defence measures that improve the waterfront environment and increase awareness of flood risk. Opportunities to improve the river frontage should be taken as new defences are constructed. In particular, there is scope to combine new defences with new development, and possibly retreat the defence in some areas with resilient development on the riverward side.

5.92 The Mayor of London, the Port of London Authority and the Council are committed to improving Bexley's wharves on the River Thames for freight operation. A review of safeguarding directions for London's wharves has been carried out by the Mayor and been approved by the Secretary of State. One of Bexley's wharves, Railway Wharf in Erith, adjacent to the town centre, has been removed from safeguarding. Safeguarded wharves are shown on the submission policies map.

5.93 Alternatives to encroachment by development should be sought to increase storage of the river, restore character and conserve archaeology. Water management measures should also maximise ecological and amenity value. Opportunities to use large open spaces such as Erith and Crayford Marshes as tidal flood storage must ensure these spaces are multifunctional in that they are also designed to enhance biodiversity value and appropriate forms of recreation and public access.

5.94 The Marine Management Organisation (MMO) should be referred to for guidance on any planning activity that includes a section of coast or tidal river. The tidal Thames and the tidal extent of its tributaries are within the South East Marine Plan area, and all planning decisions that relate to the UK marine area must be made in accordance with the South East Marine Plan.

5.95 The MMO is also responsible for issuing marine licences under the Marine and Coastal Access Act 2009. A marine licence may be needed for activities involving a deposit or removal of a substance or object below the mean high-water springs mark or in any tidal river extent of the tidal influence. Any works may also require consideration under The Marine Works (Environmental Impact Assessment) Regulations (as amended). Early consultation with the MMO is advised. A River Works License is also required from the Port of London Authority (PLA).

SP9: Protecting and enhancing biodiversity and geological assets

Related plans, strategies and key evidence – why we need this policy

National Planning Policy Framework
The London Plan 2021
Sites of Importance to Nature Conservation (SINC) Report
Bexley Green Infrastructure Study

5.96 The NPPF sets out the overarching approach to biodiversity protection and the London Plan protects designated SINC from development, whilst also placing an additional duty on the London boroughs to ensure steps are taken to further protect biodiversity. The Environment Bill strengthens provision for improving the natural Environment, including a biodiversity net gain objective, to ensure biodiversity value attributed to a development exceeds the pre-development biodiversity value of the onsite habitat by at least 10%.

5.97 This strategic policy seeks to ensure that the quantity of Bexley's biodiversity is protected and enhanced, including avoiding adverse impacts from development on species and sites of nature conservation value. Biodiversity is short for biological diversity and includes every living thing; plants, animals, fungi, algae, bacteria, even viruses. Geodiversity is the variety of rocks, fossils, minerals, natural processes, landforms and soils that underlie and determine the character of our landscape and environment.

5.98 Bexley is home to a number of important wildlife species and habitats. Some species of plants and animals are afforded legal protection, for example under Schedules 1, 5 and 8 of the Wildlife and Countryside Act 1981 (as amended). A number of habitats and species are identified in national, regional and local biodiversity action plans. The important contribution of sites of importance for nature conservation (SINC) and geodiversity value in the borough is recognised.

5.99 Linking many of Bexley's SINC, Green Belt and other green spaces and waterways is a network of green wildlife corridors. This network allows some species with specialised habitat requirements to extend their distribution into parts of London where they would otherwise not be present. The rivers, canals road and rail-side land are important components of these corridors and are a great benefit to London's biodiversity.

5.100 The SINC land use designation protects those local wildlife sites that are important to the whole of London, to the borough and the local area. SINC are identified according to London-wide set criteria for biodiversity and local distinctiveness. The process of site identification, review, and changes to SINC is overseen by the London Wildlife Sites Board. Although sites of similar quality may be found elsewhere, damage to designated sites would mean a significant loss to London or the borough. Sites and designated areas are updated periodically by the Council, which publishes the most up to date site boundary information and description in its SINC Report.

5.101 Local Nature Reserves (LNR) are specifically designated by the Council for public access to nature, under Section 21 of the National Parks and Access to the Countryside Act 1949 and amended by Schedule 11 of the Natural Environment and Rural Communities Act 2006. Nature reserves provide a significant and long-term contribution to nature conservation and are an important resource for the community, making a positive contribution to health and wellbeing. The borough has four local nature reserves, covering 103.02ha. These are: Lesnes Abbey Woods; Danson Park Bog Garden; Foots Cray Meadows; and Crossness nature reserve.

SP9 The protection and enhancement of biodiversity and geological assets

1. In its planning decisions, planning policies and action plans, the Council will protect and enhance the borough's biodiversity and geodiversity assets, in line with national and regional policy, by:
   a) ensuring development in Bexley does not adversely affect the integrity of any European site of nature conservation importance;
   b) recognising the value of landforms, landscapes, geological processes and soils as contributors to the geodiversity of the borough by protecting designated sites of special scientific interest (SSSI), and regionally and locally important geological sites (RIGs and LIGs) and supporting their sustainable conservation and management;
   c) establishing clear goals for the management of identified geological sites, in order to promote public access, appreciation and interpretation of geodiversity;
   d) protecting, conserving, restoring, and enhancing ecological networks, sites of importance for nature conservation (SINC), local nature reserves and strategic and local wildlife corridors, thus securing measurable net gains for biodiversity. Recognising and promoting those sites where ecological value has increased to a higher grade of nature conservation importance;
   e) resisting development that will have a significant adverse impact on the population or conservation status of protected or priority species as identified by legislation or in biodiversity action plans prepared at national, regional or local level;
   f) protecting and enhancing the natural environment, seeking biodiversity enhancements, net gains for biodiversity and improved access to nature, particularly in areas of deficiency, as illustrated by Figure 7, through new development and projects that help deliver opportunities for green infrastructure – preference will be given to enhancements that help to deliver the targets for habitats and species set out in the London Plan and local biodiversity action plans and strategies;
   g) enabling environmental education opportunities at the borough's schools, and investigating opportunities to involve the wider community in biodiversity or geodiversity restoration and enhancement through projects;
   h) ensuring landscaping schemes in development proposals use native plant species of local provenance; and,
   i) seeking opportunities to provide for greening of the built environment.

Policy implementation

5.102 Internationally protected sites include Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar Sites (collectively referred to as Natura 2000 sites) and form part of an international network of protected areas for nature conservation. There are no Natura 2000 sites within the borough. However, possible pathways whereby development within the borough proposed by the Local Plan that may affect sites outside the borough have been assessed in the Habitat Regulations Assessment.

5.103 London's geological sites are protected through their designation as sites of special scientific interest (SSSI), regionally important geological sites (RIGS) or locally important geological sites (LIGS). SSSI have statutory protection and are nationally recognised for their flora and fauna, geological, or physiographical (landform) features. In Bexley, there are two SSSI: Abbey Wood in Belvedere, and Wansunt Pit in Crayford.

5.104 RIGS and LIGS complement the SSSI coverage and are the most important places for geology and geomorphology outside the statutory network. These are geological sites of particular importance in London and the borough that are identified by the London Geodiversity Partnership, working with the GLA. Much of our geological knowledge has come from the study of exposed rock faces

and the fossil remains found in the rock strata, making geological sites a vital part of our historical heritage. The list of sites may be updated periodically by the London Geodiversity Partnership.

Areas deficient in access to nature

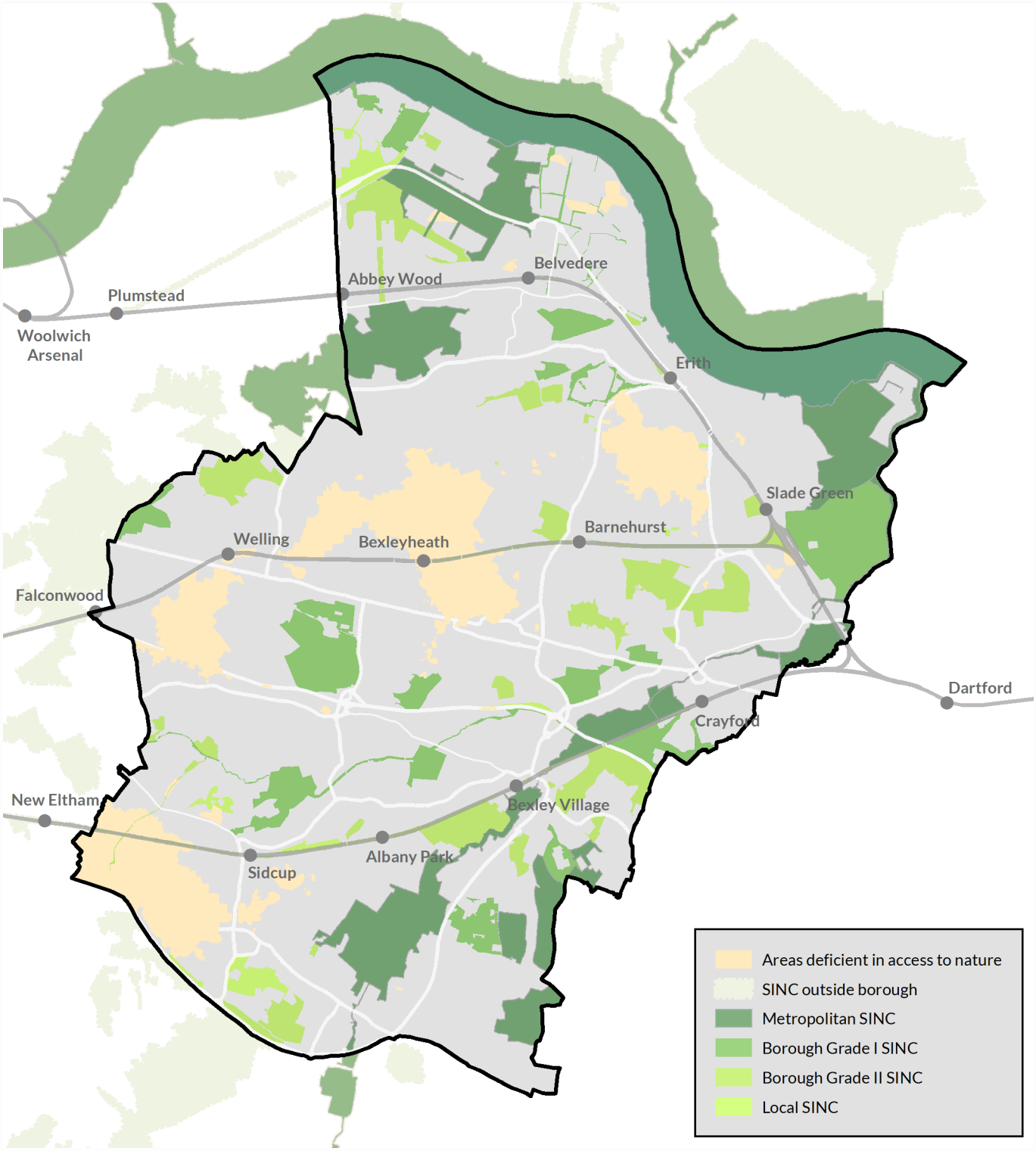


Figure 7: Map of designated SINC and areas deficient in access to nature

5.105 There are three RIGS in Bexley: North End Pit in Erith Park; Chalky Dell; and the Erith Submerged Forest. In addition, Parish's Pit has been designated as a LIGS. Sustainable conservation, management and interpretation of Bexley's underlying geology is important as they provide an important resource for education and research.

5.106 Chapter 10 of the Bexley Green Infrastructure Study presents an overview of the ecological networks in Bexley, including green and wildlife corridors, SINC and stepping stones between sites. There are also smaller unidentified local wildlife corridors within and between sites that support the functioning of the network. A list of designated sites can be found on the biodiversity pages of the Council's website. The Bexley SINC Report provides additional details of local wildlife sites and strategic wildlife corridors that are of the highest importance within the borough. The definitive boundaries and hierarchy of all SINC in the borough can be found on the submission policies map.

5.107 Biodiversity and geodiversity are material considerations in determining planning applications regardless of whether ecological or geological features benefit from statutory protection. It must be recognised that important habitats and protected or notable species are not confined to designated sites but can be found on almost any site.

5.108 Applicants preparing development proposals that might have the potential to adversely impact a European site of importance for nature conservation outside the borough should seek advice from Natural England as to whether a Habitat Regulations Assessment will be required. Consideration should also be given to any potential adverse impacts on the Thames Estuary and Marshes SPA through increased visitor pressure and reduced water quality, and on Epping Forest SAC through reduced air quality.

5.109 Applicants should consider whether their development proposal is likely to affect an SSSI and choose whether to seek pre-application advice from Natural England. This will allow any potential impacts to be considered within the planning application and so minimise the risk of delays at the formal planning stage. Natural England's impact risk zone assessment tool helps inform whether the development proposal is likely to affect an SSSI. This uses a geographic information system to define potentially damaging developments and activities in order to help provide an important first line of defence for conserving natural features.

5.110 Development proposals, especially those that are within or adjacent to a designated wildlife corridor will be expected to protect, conserve, restore and enhance wildlife movement by creating and enhancing ecological network linkages and/or enhancements between and through the development site and the corridor, where appropriate.

5.111 Notwithstanding the extensive network of biodiversity sites, parts of the borough are deficient in access to nature (see Figure 7). Development proposals should maximise opportunities for biodiversity enhancements; including pursuing opportunities to improve biodiversity in and around other developments as an integral part of design, especially where this can secure measurable net gains for biodiversity and enhance public access to nature.

5.112 The Council is committed to reducing habitat fragmentation from new development and increasing ecological connectivity. Development proposals should consider features such as living walls and roofs, hedgerows, tree networks, wildlife corridors and wildlife crossing points to improve connectivity for wildlife through developments. Taking action at a local level and through specific developments is supported. The introduction of features such as green roofs can provide insulation as well as improving the biodiversity value of a development.

➲ DP20: Biodiversity and geodiversity in developments

Related plans, strategies and key evidence – why we need this policy

Sites of Importance to Nature Conservation (SINC) Report
Bexley Green Infrastructure Study

5.113 Bexley contains a wide variety of wildlife habitats, including woodland, heathland, reed beds, rivers and streams, ponds, lakes, marshes, grassland and "wasteland" – the latter a term usually given to the open, flower-rich habitat that develops on brownfield sites. Geology has strong ties with biodiversity, in that the nature of the substrate, as usually determined by the nature of the underlying rock, is a key factor in determining the distribution of habitats and species.

5.114 Bexley is home to a number of different plant and animal species. Some of these are rare or declining and are of regional or national importance. However, a species does not have to be rare or threatened to be interesting and important. They may have strong cultural significance, or simply look or sound beautiful. Key species in Bexley include black poplar, lesser calamint, bluebells, wild daffodil, common lizard, kingfisher, newts, skylark, stag beetle and water vole.

5.115 The richness of Bexley's natural environment also includes wildlife corridors along waterways and railways as well as on the River Thames and its tributaries, private gardens including front gardens that are of importance in terms of providing habitat and wildlife corridors or stepping stones, and contribute extensively, especially in outer London, to green infrastructure and the ability of wildlife to move between larger sites and extend their distribution into parts of London where they would otherwise not be present.

DP20 Biodiversity and geodiversity in developments

Protection for biodiversity

1. Development proposals will only be permitted where it can be demonstrated that:
   a) a strict approach to the mitigation hierarchy has been taken (i.e. avoid, mitigate, compensate and net gain) and all unavoidable impacts on biodiversity can be justified;
   b) completion of the development will result in a measurable long-term net gain for biodiversity, as demonstrated through the application of an acceptable method of measurement, and/or impact assessments;
   c) biodiversity enhancement measures and where appropriate mitigation measures have been incorporated within the design, layout and materials used in the built structure and landscaping;
   d) opportunities to help connect and improve the wider ecological networks, wildlife corridors and stepping stones for wildlife have been taken by creating linkages through the development site;
   e) deficiencies in access to nature conservation are reduced, where possible; and,
   f) opportunities to increase wildlife aesthetic value and visual connections with important features have been considered.

Protection of designated sites and habitats

2. Development proposals that would have a direct or indirect impact on a site designated for its nature conservation or geological interest should protect and enhance the designated site's value, and will not be permitted unless all of the following criteria are met:
   a) there are no reasonable, less damaging, alternative solutions, locations or sites;
   b) ecological buffer zones have been incorporated into the scheme, where appropriate, to protect and enhance the designated site's intrinsic value;
   c) the continuity of wildlife habitat within wildlife corridors is maintained; and,

DP20 Biodiversity and geodiversity in developments

d) access to the designated site is not compromised and where possible, access and/or interpretation is improved.

Protection of ancient woodland and veteran trees

3. Irreplaceable habitats, including ancient woodland and aged or veteran trees found outside of ancient woodland will be protected from loss or deterioration resulting from development. Where development proposals may affect irreplaceable habitats and their immediate surroundings, the following principles of good practice shall be used to guide the site assessment and design of development:
   a) establishment of the likelihood and type of any impacts;
   b) implementation of appropriate and adequate mitigation, compensation, and management measures that respect the features and characteristics of the veteran trees and/or ancient woodland;
   c) provision of adequate buffers; and
   d) provision of adequate evidence to support development proposals.

Policy implementation

Protection for biodiversity

5.116 Before starting a project, all applicants including householders and smaller developers should consider what current value their site has for wildlife, whether ecological surveys are needed, and what opportunities exist to enhance or create wildlife value through good design. The Design Guide SPD will provide useful guidance.

5.117 Any development has the potential to impact, both negatively and positively, on local biodiversity through its effects on nature conservation features. Proposals should demonstrate how each step of the mitigation hierarchy has been considered within the design, ensuring measures for mitigation, compensation, and biodiversity net gains are appropriate, in terms of design and location, and are secured for the lifetime of the development. Where appropriate, future maintenance, monitoring, and funding mechanisms will need to be secured. Development proposals that cannot satisfy the requirements of the mitigation hierarchy will be refused planning permission in accordance with the NPPF.

5.118 To achieve net gain for biodiversity a development must leave biodiversity in a better state than it was before development took place; and to ensure biodiversity value attributed to a development exceeds the pre-development biodiversity value of the onsite habitat. During the early stages of design, developers should confirm what % uplift will be required with the local authority. Natural England's Biodiversity Metric can be used as a quantitative metric to calculate the biodiversity of a site before and after development.

5.119 Development proposals should demonstrate within the design and access statement and other material submitted with the planning application how biodiversity has informed the design. Major development, and where applicable smaller developments, will be expected to submit an ecological assessment that has informed the design, layout and type of enhancements incorporated in the proposal.

5.120 Developments can contribute to the wider ecological network by reducing artificial light spill and including simple features such as permeable boundary walls and fencing for small mammals, or vegetative crossing points and eco-passages under roads to help maintain, create and enhance existing and new wildlife commuting routes.

5.121 Features such as artificial nest sites, which are of particular relevance and benefit in an urban context, should be incorporated within the built structure. Where biodiversity features are incorporated within development proposals, conditions will be set that will seek to protect the features to ensure their long term retention and replacement if needed.

5.122 Nature conservation is not restricted to the preservation of wildlife but goes hand in hand with the enjoyment of it by all people. During the design process, consideration should be given to the visual qualities of nature conservation features, both on and offsite; and how views of them can be enhanced.

5.123 Access to nature is an important consideration, especially in areas where deficiencies have been identified. In these areas, it is particularly important that opportunities be taken to preserve, enhance or create areas of nature conservation value, so that people are able to have access to enjoy nature.

5.124 For those sites not within nature conservation deficiency areas, it is also important to consider opportunities to further improve accessibility to nearby SINCs. Some access is desirable to all but the most sensitive of SINCs. Opportunities to improve biodiversity in and around other developments should be pursued as an integral part of their design, especially where this can secure measurable net gains for biodiversity and enhance access to nature.

Protection of designated sites and habitats

5.125 The identification of direct and indirect impacts of a development proposal that is adjacent to or incorporates a designated site within its site boundary should be informed by an impact assessment. Proposals will need to demonstrate how the overall spatial design has avoided and minimised negative impacts on the designated site and maximised opportunities to benefit the designated site's intrinsic value.

Protection of ancient woodland and veteran trees

5.126 Most of the woodland areas within the borough lie within designated SINC and comprise broadleaved woodland with some small pockets of coniferous woodland scattered across Bexley, including 134 acres of ancient woodland. All areas of ancient woodland within the borough are also covered by a SINC designation. Several areas of ancient woodland are of a notable size, including Lesnes Abbey Woods, which adjoins Bostall Woods in Greenwich, and Joyden's Wood, which crosses the boundary into Dartford. Several smaller fragmented areas of ancient woodland are distributed throughout the borough, either within residential areas or included within other open spaces. The Bexley Green Infrastructure Study maps the locations of ancient woodland.

5.127 Development must be designed to avoid the loss of, or in the case of adjacent development detrimental impact on, irreplaceable habitat. If a development is likely to harm ancient woodland or veteran trees, unequivocal and credible evidence should be prepared to justify the exceptional need and benefits and submitted alongside the planning application. The need for housing, or need for new transport infrastructure, does not constitute exceptional circumstances.

5.128 Natural England and Forestry Commission Standing Advice on Ancient Woodlands and Veteran Trees will be considered when assessing planning applications. Further guidance on how to adopt principles of good practice is detailed within the woodland trusts practical guide on planning for ancient woodland.

DP21: Greening of development sites

Related plans, strategies and key evidence – why we need this policy

The London Plan 2021 – Policy G 5
Bexley Green Infrastructure Study

5.129 The 'greening' of Bexley's streets, buildings and other public spaces does more than change the look of these places. Roofs and walls covered in plants, street trees and small pocket parks in between buildings make the borough a better place to live, work and invest. These greening features act as an important part of Bexley's green infrastructure network: cleaning the air, reducing the risk of flooding; helping to cool the borough; and providing important habitats for species. Certain habitats such as wetlands can reduce the impacts of water run-off and hence reduce flood risk and pollution of waterways.

5.130 Wildlife habitats and access to them also play a vital part in human wellbeing. The benefits to local people provided by nature conservation features can be far ranging. They include valuable ecosystem services such as mitigating the damaging effects of air pollution and climate change, as well as aesthetic and amenity benefits. Trees and planting can provide a valuable shading effect in summer and insulation effect in winter.

DP21 Greening of development sites

1. Development proposals should set out what measures have been taken to achieve urban greening onsite; and all new major developments should quantify what Urban Greening Factor (UGF) score has been achieved.

2. Development proposals will be required to provide a high standard of landscape design, having regard to the well-being, water, wildlife and character of the surrounding area, ensuring sustainable planting for the long term and be supported by appropriate management and maintenance measures.

3. There will be a presumption in favour of the retention and enhancement of existing trees, woodland and hedgerow cover on site; and planning permission will not normally be permitted where the proposal adversely affects important trees, woodlands, or hedgerows.

4. Development proposals should maximise potential for the planting of new native trees and hedges within the development site and new streets should be tree-lined, unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.

5. Planting and landscaping within developments and ecological buffer zones:
   a) will be required to contribute to habitats and features of landscape and nature conservation importance; and,
   b) must not include 'potentially invasive, non-native species'; and, where found on a site, appropriate measures to remove these species must be taken as part of the redevelopment.

Policy implementation

5.131 Applicants are required to incorporate urban greening measures in the layout and design of a scheme with the aim of achieving a UGF score of at least 0.4 for major residential schemes and at least 0.3 for major mixed-use or commercial schemes. These targets are a starting point that will inform the right level of greening for each development.

5.132 Several accreditation schemes have been developed that set standards for the quality of green infrastructure within developments. Proposals which undergo a recognised accreditation process will be considered positively.

5.133 The UGF should be based on the factors set out in Table 8.2 following London Plan Policy G5 Urban Greening. This will help to increase green cover across each development. In areas where there is little opportunity for additional vegetation at ground level, the UGF will promote the incorporation of green walls and green/brown roofs.

5.134 Chapter 9 of Bexley Green Infrastructure Study sets out evidence on existing urban greening features in Bexley; and the Design Guide SPD will provide additional guidance on incorporating greening into developments.

5.135 Planting schemes should be selected according to their suitability for local growing conditions (soil, temperature ranges, rainfall, sunlight and shade), the ability to attract wildlife (e.g. nectar rich planting) and conserve water. The selection of species for planting schemes should also consider the species long term sustainability in a changing climate. This will need to be evidenced in a Design and Access Statement and soft landscaping plans to ensure the right plants are located in the right place.

5.136 As part of the formal planning process, all trees and hedges present on a proposed development site should be assessed to establish their amenity, nature or landscape conservation value. The Council expects that trees or hedges deemed to have significant value will be retained and protected from harm. Their significance may be as a result of their size, form and maturity, aesthetic value or because they are rare or unusual, form part of ancient woodland or hedgerow, have a veteran tree status or are protected under a tree preservation order.

5.137 Applicants should check with the planning authority to ascertain whether any trees potentially affected by the proposed development are protected by way of a Tree Preservation Order (TPO) or Conservation Area. When considering felling trees related to development, consents for tree felling may be required under different regimes, even if a planning application is not needed. The Forestry Commission guidance on planning applications affecting trees and woodland provides advice on when to consult the Forestry Commission.

5.138 A landscaping scheme should be submitted alongside the planning application that makes provision for the retention of existing trees and hedges with significant value. Younger trees or hedges that have the potential to add significant value to the landscape character in the future should also be retained where possible. Their retention should be reflected in the layout of the development proposal, allowing sufficient space for new and young trees to grow to maturity, both above and below ground.

5.139 Due to the environmental importance of trees, implementing at least a '1 for 1' replacement rate is desirable for any tree affected by development that is not covered in paragraph 5.130 above. The Council expects developments to incorporate additional trees wherever possible. Where trees are incorporated within development proposals, conditions will be set that will seek to protect the trees to ensure their long term retention and replacement if needed.

5.140 Not all hedges are beneficial to the environment and, in certain cases, planting the wrong type of hedging plants can lead to difficulties. Hedge heights can sometimes detract from the reasonable enjoyment of a home or garden. Part 8 of the Antisocial Behaviour Act 2003 gives local authorities powers to determine complaints submitted by householders in respect of a neighbour's high hedge. Further information and advice on high hedges can be found on the Council's website.

5.141 Landscaping should aim to complement the biodiversity of the locality and incorporate native plant species. Where appropriate the Council will accept non-native species for trees and other plants,

as long as they are deemed to be suitable and non-invasive. Opportunities to increase wildlife aesthetic value and visual connections with important features should be considered. This is particularly important where the application adjoins a site of importance for nature conservation, nature reserve or is within or adjacent to a wildlife corridor. Where appropriate, the Council will require details to be provided within a Landscape and Ecological Management Plan.

5.142 In selecting appropriate trees and layout for new tree-lined streets, applicants should work with the local planning authority including local highways officers and tree officers to ensure that the right trees are planted in the right places, and solutions are found that are compatible with highways standards and the needs of different users.

5.143 Planting new trees and shrubs, especially of native species, can help to soften the harsh lines of new built development and add interest to the design. The benefits of trees include improved mental health and wellbeing, contributing to the beauty and quality of the street scene, providing shade and cooling to offset the 'heat island effect,' providing habitats, mitigating against the risk of surface water flooding, reduction in noise pollution, filtering pollutants from the air, and preventing shrinking and heave during hotter weather.

5.144 Potentially invasive, non-native species are listed in Schedule 9 of the Wildlife and Countryside Act. Invasive non-native species (INNS) are one of the largest threats to global biodiversity after habitat loss and destruction. The London Invasive Species Initiative (LISI) has been created to help address these environmental and economic problems within the Greater London area and has compiled a list of species of concern.

5.145 Development sites where invasive non-native species are present (most commonly Japanese knotweed) require coordinated and considered action to ensure that there is no breach of relevant legislation or no threat of spread. Where they are present on a development site, appropriate methods must be used to ensure they are removed. The following steps should be followed:

1. early detection;
2. create a site plan;
3. control;
4. contain;
5. keep records and monitor.

5.146 The LISI website should be referred to and the guidance provided should be followed. The Great Britain Non-Native Species Secretariat (NNSS) and the Invasive Non-Native Specialists Association (INNSA) provides further guidance.

6. Bexley's infrastructure: provision and management of resources for good growth

Related Council key plans and strategies

Bexley Growth Strategy
Connected Communities Strategy
Local Implementation Plan (LIP)
Infrastructure Delivery Plan (IDP)

6.1 The NPPF's economic objective includes the need for identifying and coordinating the provision of infrastructure. As well as setting out an overall strategy for the pattern, scale and quality of development, local plans should make sufficient provision for the infrastructure needed to support this strategy.

6.2 Chapter 5 focussed on ensuring that development in the borough both contributes to the provision of, as well as the protection and enhancement of, community services and facilities, green and blue infrastructure, and the ecology of the borough.

6.3 Policies in this chapter seek to ensure that sufficient provision is made for infrastructure for transport, waste management, water supply, wastewater, and minerals and aggregates. 'Sufficient provision' is considered to be the need for projects that are critical in relation to planned growth set out in this Local Plan and those that are essential to ensure that development is sustainable or otherwise acceptable.

6.4 This chapter sets out the strategic and non-strategic policies to address these infrastructure issues and how they should be dealt with in a coordinated manner as proposals for new development come forward, taking account of the policies already in the London Plan. Specific infrastructure projects are identified in the Infrastructure Delivery Plan that supports the Local Plan.

6.5 In line with both the NPPF and the London Plan, these policies have been developed through liaison with relevant infrastructure providers, operators and stakeholders wherever possible.

➲ SP10: Bexley's transport network

Related plans, strategies and key evidence – why we need this policy

Mayor's Transport Strategy (MTS)
Local Implementation Plan (LIP)
Local Plan Transport Assessment (LPTA)

6.6 As an outer London borough, Bexley has transport characteristics that combine those of both Greater London and its bordering county of Kent. The borough has no Underground, Docklands Light Railway, tram or other rapid transit services. Bexley has a low average PTAL (public transport access level) score – on the cusp of PTAL 1b/2 – that places it in the bottom five London boroughs for accessibility. Much of Bexley is made up of relatively lower density residential areas.

6.7 Factors such as these have informed the approach to sustainable development in this Local Plan. The low levels of public transport in the borough has led to higher car ownership than many London boroughs and the car being the travel means of choice for the majority of journeys. The Elizabeth line is currently expected to open to Abbey Wood in the first half of 2022; it will bring a major step-change in connectivity (including much reduced journey times) particularly for Abbey Wood and for part of the north of the borough.



Figure 8: Bexley and the strategic transport network (road and rail)

6.8 Bexley's strategic transport corridors all run east-west (both rail and road), as shown in Figure 8. The nearest strategic north-south road links are the A205 South Circular to the west and the M25 to the east. Indirect north-south rail links are provided by loop services between the east-west lines. The potential to improve to north-south movement within the borough, by any mode of travel, is severely constrained.

6.9 Likewise, options for improving freight movement are limited. There is no provision in the borough for freight to join the rail network, though it does benefit from wharves along the Thames. Distribution/logistics is a key sector for Bexley's industrial areas, especially in the north of the borough. As a consequence, local distribution is hampered by the nature of the borough's road network – adding to delivery costs by making journey times longer and less reliable. Longer distance freight movements are reliant on strategic corridors such as the A2, A20 and A206/A2016 South Thames Development Route (STDR), so operational performance relies on the smooth operation of those routes, along with the feeder roads to and from them.

6.10 Despite all this, Bexley's position on the wider transport network and in the Thames Gateway sub-region may provide significant opportunities for development growth in the medium to long term, as supported in the Growth Strategy. This would be heavily dependent on the required infrastructure (particularly additional transport schemes) being put in place.

6.11 Bexley's Local Implementation Plan (LIP) sets out both the local strategy for transport in the borough and a three-year programme of measures for implementation. The LIP supports delivery of the Mayor's Transport Strategy (MTS), including the Mayor's objective that, by 2041, 80% of all journeys in London should be by means other than the car. The LIP includes a local mode share target for the borough for 2041, set at a lower level than the outer London average, taking some account of Bexley's connectivity issues.

6.12 The Council is both highway and traffic authority for all roads in the borough apart from the A2 and the A20. This includes the strategic road network for London (which takes in the A206/A2016 STDR), although Transport for London (TfL) also has a network management role in respect of those roads. The classification of roads is set out in Table 11.

6.13 Despite existing bus and rail connections and support for cycling and walking initiatives, the car will still have a role to play in Bexley. Unless other measures are put in place, providing more road

capacity will simply increase traffic flows, resulting in more traffic congestion, less attractive places and more air pollution. It is important therefore that development schemes include positive proposals that provide for and promote the use of more sustainable ways of travelling.

SP10 Bexley's transport network

1. The Council will work to achieve a comprehensive, high-quality, safe, integrated and sustainable transport system, which makes the most of existing and proposed transport infrastructure within the borough. The map of Bexley's transport network, including locations of key transport project proposals, are set out in Figure 9. The Council seeks to ensure a much improved and expanded role for sustainable transport through the following actions:

   a) initiating or supporting the future development of major new public transport infrastructure proposals within or affecting Bexley, including an extension of Docklands Light Rail to Belvedere, Bus Transit from North Greenwich to Slade Green, River Thames passenger services, including the upgrading of Erith Pier, and new Thames crossings – the Council will explore, by continued negotiations with Transport for London and the Port of London Authority a firm basis for the further progression of these schemes;
   b) increasing the capacity, frequency, accessibility and safety of established bus and rail facilities;
   c) supporting the improvement of interchange facilities within the borough's major town centres through area-based schemes and other initiatives;
   d) encouraging walking and cycling within the borough through implementation of local and strategic walking and cycling programmes, travel plans, local safety schemes, the provision of facilities within development proposals, and environmental improvement projects;
   e) using local targets included in the Council's Local Implementation Plan to ensure Healthy Streets concepts and the Mayor's Transport Strategy's mode share targets are reflected in development proposals;
   f) working with the Crossrail to Ebbsfleet (C2E) partnership to secure the potential extension of the Elizabeth Line, including the protection of the land required for the scheme in accordance with existing and future Safeguarding Directions, and the managing of development to preserve and enhance the deliverability of the scheme;
   g) promoting improvements in north-south transport provision, including facilitating junction improvements, clearer signing, and enhanced bus services and facilities – in particular, improved connections will be sought with Abbey Wood station and the Elizabeth line;
   h) improving the efficiency and promoting the sustainability of freight movement in the borough and ensuring construction and operation of any new rail freight facilities, or wharves for waterborne freight handling, where this does not unduly prejudice other objectives of the Local Plan;
   i) developing other targeted road schemes, where they assist regeneration and/or reduce congestion, whilst generally promoting modal shift away from the use of the car;
   j) effectively maintaining and efficiently managing the existing highway network to reduce congestion and unnecessary delays, improve the environment, in particular air quality, and promote safety, health and wellbeing;
   k) encouraging a new transitional approach to providing and managing residential car parking within new developments in areas where parking demands and provision could both reduce over time as more sustainable means of connectivity are improved; and
   l) resisting the change of use or redevelopment of existing railway station car parks and car parks that perform a wider town centre function unless suitable replacement spaces are provided.

2. The Council will work with Transport for London and with Highways England so that necessary infrastructure interventions on the strategic road network required to support future development proposals in the borough are better understood, potential solutions found, and a funded and deliverable programme of measures identified.

Bexley's transport network

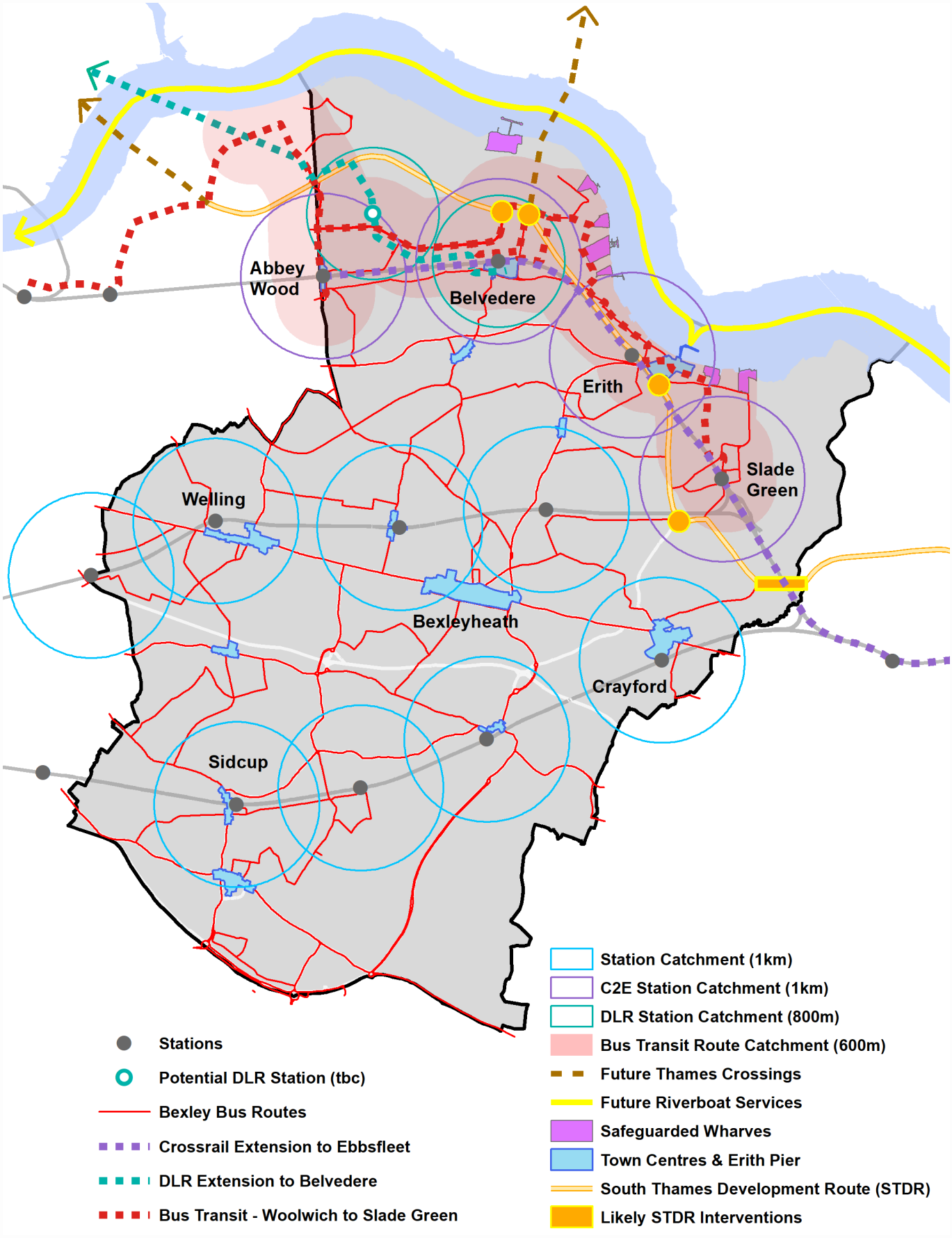


Figure 9: Bexley's transport network

Policy implementation

6.14 The Council will continue to work with TfL to deliver new development and improved public realm in a way that encourages walking, cycling and use of public transport (including using the Mayor's Healthy Streets approach). The Council therefore supports delivery of projects as part of the London Bus Priority Network. The Council will also work with Network Rail and neighbouring local authorities towards overcoming the remaining barriers to full 12-car train operation (both within and outside the borough).

6.15 The Healthy Streets Check for Designers will be applied to Council LIP-funded schemes as appropriate. Further details and information are set out in Bexley's Highway Authority Developer Guidance and will be included in the Design Guide SPD. Figure 10 illustrates the ten Healthy Streets indicators, which describe how their design should enable and encourage people to choose to walk, cycle and use public transport more.



Figure 10: Transport for London's 10 healthy street indicators (source: Lucy Saunders)

6.16 It will be important to support the growth set out in the Local Plan with new transport services and infrastructure. This will be across the Plan period, through a mix of LIP implementation, transport improvements through new development and investment in major schemes. To this end, the Council will work closely with TfL and, in respect of transport on the River Thames, the Port of London Authority (PLA). Beyond the Plan period, further examination of DLR to Belvedere will be needed when preparing a planning framework for the Bexley Riverside Opportunity Area.

6.17 The Council will work with TfL on the scheme's technical development; future development proposals will be expected to facilitate its delivery; and the Council will expect development proposals on the route corridor to design buildings and public realm that positively incorporate it.

6.18 The Council supports delivery of an upgraded Thames pier at Erith for access to extended river bus services. Erith pier has been incorporated into the town centre boundary to encourage more active use The Council will work with TfL and the PLA towards delivery of the upgrades to the pier and provision of a new river bus link.

6.19 Adverse impacts to air quality from emissions to air from vessels on the River Thames is a health and environmental priority issue. Further information, including targets and actions, is set out in Port of London Authority's Air Quality Strategy.

6.20 Additional Thames crossings are supported in principle, subject to no significant adverse impacts, such as increased traffic flows or worsening air quality along the borough's roads.

6.21 The Council will work with TfL, Network Rail and train operators to protect and improve public transport interchanges. Area schemes that focus on interchange nodes will be progressed as part of the LIP.

6.22 North-south links within the borough have long been a concern. The Council continues to work through its LIP programmes and with TfL to secure solutions. TfL have proposals for upgrading bus feeder services to Abbey Wood for the opening of the Elizabeth line.

6.23 Many businesses in the borough rely on effective logistics and need routes available to them that are not congested or unreliable. Freight wharves on the Thames are safeguarded for that use and their access routes protected. Rail routes through Bexley remain important corridors for freight. The Council will work with TfL to identify ways to make freight movement in the borough more sustainable, particularly for local deliveries.

6.24 Key points along STDR are already operating at or beyond capacity, including the Queens Road roundabout at Erith and the single carriageway section of Thames Road. Delays along the route are already of concern to businesses along the corridor. The Local Plan therefore expects targeted interventions to deal with excess congestion will be necessary along STDR in particular, to ensure a suitable 'level of service' is maintained.

6.25 Air quality monitoring will be through Bexley's Air Quality Annual Status Report, which provides a detailed overview of air quality in the borough. Monitoring stations across the borough are located mainly at roadside.

6.26 Where larger development is to be phased, parking layouts should be designed flexibly, with less private on-plot parking, so that parking areas can be re-used or redeveloped as other means of travel are improved and the need for car parking reduces. This will enable later phases to be brought forward so that they reflect and support the newer travel alternatives.

➲ SP11: Safeguarding land for transport schemes

Related plans, strategies and key evidence – why we need this policy

Local Implementation Plan (LIP)
Local Plan Transport Assessment (LPTA)

6.27 The London Plan stresses the need to work collaboratively with strategic partners to achieve good transport connectivity and Policy T3 Transport capacity, connectivity and safeguarding sets out expectations for Development Plans, with Table 10.1 setting out the indicative of transport schemes. Part B of the policy requires the safeguarding of both the existing transport asset base and the land and other requirements for future transport infrastructure requirements. Part C

expects relevant schemes in Table 10.1 to be safeguarded. Part D includes the need to give particular priority to securing and supporting delivery of eastern extension of the Elizabeth line.

6.28 Policy SP11 sets out Bexley's approach to these requirements, taking into account identified transport needs in the Bexley Growth Strategy and in the Bexley Local Implementation Plan (LIP). New development identified in the Local Plan will increasingly need to be supported by new transport interventions across the Plan period, as well as by existing transport assets in the borough. Emphasis will be placed on public transport provision, on walking and cycling, and on other transport schemes that are required to deliver the Local Plan's objectives.

SP11 Safeguarding land for transport schemes

1. The Council will support development proposals that complement and do not frustrate delivery, operation or retention of existing and future transport infrastructure.

2. Unless existing transport infrastructure is agreed as surplus to requirements by the relevant strategic authority, operator or owner, development proposals should not prejudice its continued role, operation or effective, beneficial use. Where this is unavoidable, development proposals should include feasible means of replacing the affected transport infrastructure with alternatives of at least the same quality, funded through developer contributions. This applies to transport infrastructure used for:

   a) walking;
   b) cycling;
   c) public transport services;
   d) traffic on the public highway; and
   e) piers/wharves (and access to them) to enable movement of people and goods on the River Thames.

3. Development proposals should support the plans to secure investment in, deliver and operate the following key transport infrastructure:

   a) an extension of the Docklands Light Rail to Belvedere via Thamesmead;
   b) Bus Transit route corridor priority measures and related interventions;
   c) targeted traffic capacity increases on the South Thames Development Route (A206/A2016);
   d) a crossing of the River Thames between Belvedere and Rainham (likely to be beyond the Plan period);
   e) an upgrading of Erith Pier to accommodate riverbus services; and
   f) a cycling/walking crossing of the River Darent north of the A206 Bob Dunn Way.

   Development proposals will not be accepted that prejudice the successful planning and delivery of these schemes, illustrated on Figure 9.

4. Land is safeguarded for the following strategic transport infrastructure schemes:

   a) Eastern extension of Crossrail services from Abbey Wood towards Ebbsfleet (C2E), in accordance with the relevant Safeguarding Direction(s) by the Secretary of State for Transport; and,
   b) A206 Thames Road dualling between Bob Dunn Way and Crayford Way, including widening Cray Mill Bridge and enlarging the Thames Road/Crayford Way roundabout, as illustrated on the submission policies map.

Policy implementation

6.29 The Local Plan Transport Assessment (LPTA) includes a schedule of existing transport assets and infrastructure in the borough that should be protected from adverse impacts of development unless it is genuinely surplus to requirements. The onus will be on development proposals to identify the status of existing transport assets that may be affected by the development and to determine how to avoid or, where necessary, mitigate any negative impacts. The Council will work

with TfL and developers to ensure that future delivery of the identified transport schemes will not be compromised by any development proposals.

➲ DP22: Sustainable transport

Related plans, strategies and key evidence – why we need this policy

The London Plan 2021 – Policy T 1(A)
Local Implementation Plan (LIP)
Local Plan Transport Assessment (LPTA)

6.30 London Plan policy T1(A) places emphasis on the Mayor's strategic target of 80% of all trips in London by foot, cycle or public transport by 2041. Policy T1(B) looks to all development to make the most effective use of land (given that is achieved, amongst other things, through greater roles for public transport, walking and cycling) and protection of London's transport networks and supporting infrastructure. The indicative list of transport schemes in Table 10.1 places its emphasis on active travel and public transport-based travel solutions.

6.31 The Growth Strategy stresses the need for greater use of public transport, walking and cycling, especially at neighbourhood and local levels, from new developments. Encouraging walking and cycling at neighbourhood level should especially be addressed through development design. Cycling and public transport use for local journeys beyond the immediate neighbourhood requires development layouts that positively point to use of those modes of travel.

6.32 Bexley's LIP has taken forward the Mayor's strategic mode share target and how different solutions will work towards delivery of local targets. The LIP places emphasis on public transport-based solutions, as well as promoting and seeking better provision for walking and cycling.

6.33 The LIP also points to the importance of smarter travel options, which are becoming more relevant and accessible to many people. More electric vehicle (EV) charging points support transfer to less environmentally damaging vehicles, preparing the way for the government's planned ban on petrol and diesel vehicles; this was to be from 2040, but has been brought forward to 2035, with potential proposals for the ban to be brought even earlier to 2030.

6.34 Technical development of connected autonomous vehicles (CAVs) is advancing. Car manufacturers and other providers are developing mobile apps for Mobility-as-a-Service, which will enable people to 'rent' mobility by a blended range of travel choices. Local Demand Responsive Transit networks are taking off around the country, providing a shared taxi-style of operation that operates purely on demand. Photo-voltaic road surfaces are being developed that can generate electricity and charge EVs on the move.

6.35 These policy and technology developments place an increasing emphasis on more sustainable travel solutions. Other lifestyle options are moving people towards more home-based working and home shopping, which reduces the need to travel at all. Factors such as these are beyond the direct control of the Local Plan. However, these are all aspects that need to be considered in development proposals to ensure a greater emphasis on the importance of more sustainable access and connectivity.

DP22 Sustainable transport

1. The Council will expect to see measures in development proposals that facilitate and promote walking, cycling, public transport and shared mobility. In particular, major development proposals should incorporate where appropriate the below points at an early design or pre-application stage:

DP22 Sustainable transport

Walking

a) identify and implement accessible, safe and convenient direct walking routes to town centres, transport nodes and other key destinations;
b) promote and improve pedestrian wayfinding;
c) provide for the undertaking of audits to ensure that the existing pedestrian infrastructure is suitable for its proposed use and that new development improves pedestrian amenity;
d) encourage a higher quality pedestrian and street environment for all users through the promotion of healthy streets and integrated communities;
e) ensure residential streets encourage children to play out;

Cycling

f) provide secure, integrated, convenient and accessible cycle parking facilities in line with the standards set out in the London Plan, as a minimum;
g) provide on-site changing facilities, including lockers and showers for cyclists, where appropriate;
h) contribute positively to an integrated cycling network for London by providing infrastructure that is safe, comfortable, attractive, coherent, direct and adaptable;
i) provide links to existing and planned cycle infrastructure projects including the Council's strategic quietways network;

Public transport network

j) allocate road space and provide high level of priority on existing or proposed routes;
k) ensure good access to and within areas served by networks;
l) ensure that all parts of the network can be used safely, easily and with dignity by all;
m) ensure direct, secure, accessible and pleasant walking routes to stops;
n) ensure standing, garaging and drivers' facilities are provided where needed;
o) improve interchange between different modes of transport;

Shared mobility (smarter travel)

p) provide electric vehicle charging infrastructure in line with London Plan minimum standards, to be made publicly available where possible;
q) provide spaces for car clubs/pool cars, to be made publicly available where possible; and
r) ensure compatibility with recognised providers of both services.

Policy implementation

6.36 Development proposals have a key role to play in shaping how users of that development choose to travel. Developers should demonstrate that use of more sustainable means of travel has been considered throughout the design process and proper provision made – whether on-site as part of the development or off-site to either reinforce that use or to mitigate negative impacts from the development.

6.37 Account should be taken of the applicable requirements for each relevant travel mode, recognising that some can apply equally to walking and cycling. Design standards are set out in TfL's suite of design documents. Further details and information are set out in Bexley's Highway Authority Developer Guidance and will be included in the Design Guide SPD. The result should be that, where there is a need to travel at all, the development will naturally point people towards using the more sustainable modes. The result should be better connectivity with facilities, goods and

services in a way that helps the borough to achieve the benefits of achieving its travel mode objectives. A statement to show how these points have been addressed should be supplied at pre-application stage for discussion with the Council. Where a transport assessment or transport statement is required in support of a planning application, that statement should be included.

6.38 Both active and passive provision for electric vehicle parking will be required in line with the standards in the London Plan and details agreed in accordance with Council guidance. In larger schemes these should be evenly distributed throughout the development. Mixed use town centre development will provide secure off-street space where possible as part of the development and on-street spaces as part of public realm improvements.

6.39 The Council will support the bringing forward of car clubs and car sharing schemes in connection with new developments. Car clubs have the potential to reduce congestion and parking pressure, particularly where parking provision in new developments has been set materially lower than the maximum standard.

➲ DP23: Parking management

Related plans, strategies and key evidence – why we need this policy

London Plan Table 10.3 – Maximum residential parking standards
Local Implementation Plan (LIP)
Local Plan Transport Assessment (LPTA)
Bexley Strategic Housing Market Assessment (SHMA)
Local Plan Parking Standards and the Delivery of Family Housing Technical Paper

6.40 The London Plan sets out maximum parking standards to encourage the uptake of sustainable modes of transport and manage impacts of development on the road network. However, the London Plan also allows for higher provision in outer London boroughs and in areas that have lower public transport access levels (PTALs) where there is clear evidence that it supports additional family housing to meet identified local need.

6.41 This is consistent with the Government's position, which acknowledges the need to meet housing need whilst avoiding the adverse impacts of increasing on street parking stress. The Bexley SHMA identifies family housing as being the type most needed to be delivered in the borough, across all tenures (market, low-cost/affordable rent and intermediate housing products).

6.42 A flexible approach is supported by the NPPF, which states that local authorities should take into account a number of considerations when setting local parking standards. This should include local car ownership levels and the availability of public transport.

6.43 In line with both NPPF and London Plan guidance, the Council has taken into consideration characteristics of developments and the actual level of access to public transport and services and facilities when deciding whether to apply a more flexible approach to parking.

6.44 The Council has considered higher levels of residential parking for family housing in areas that have a lower level of public transport access to address specific on-street parking issues such as overspill and inappropriate parking, which may affect safety, amenity, accessibility, and congestion as well as the effective roll out of charging infrastructure for electric vehicles. The Council also wishes to prevent the creation of any traffic flow, safety and amenity issues through the impacts of new development.

6.45 Some areas within the borough are less connected by public transport. Even where public transport access levels (PTALs) are higher, there are still some challenges to sufficiently cater for people's travel needs. The dispersed pattern of travel can mean that dependence on the car remains high. This suggests that there is still a role for the car in Bexley, even as the Council looks to increase walking, cycling and public transport use in the borough.

6.46 The London Plan has set specific and highly ambitious maximum parking standards for outer London Opportunity Areas. However, the spatial approach to sustainable development set out in policy SP1 does not apply a blanket approach to growth in these areas. Parts of the Bexley Riverside OA in particular have poor connectivity, including access to shops, services and facilities. These areas are unlikely to change during the Plan period without significant interventions and there are no fixed London Plan commitments for these. However, if new public transport commitments were secured for Bexley, for example through the development of a planning framework for the OA, then the local policy position will need to be reviewed.

DP23 Parking management

1. In applying the principles of sustainable development in line with Policy SP1, the Council will seek to balance the need for parking and the environmental, economic and social impacts of traffic movement and parked vehicles. Therefore, proposals for residential development will be expected to provide parking within the lowest applicable maximum London Plan standards except:
   a) areas with a PTAL of 2 that are more than 5 minutes' walking distance from a railway station and town centre (see Figure 11) where 3 or more bedroom dwellings will have a maximum standard of 1.25 spaces; and
   b) within the Bexley Riverside Opportunity Area where, except for developments covered by 1a) above, maximum residential parking standards will be the London Plan outer London standards rather than the Opportunity Area standards for outer London.

2. Parking provision materially below London Plan maximum standards may be acceptable in areas that have a PTAL of 3 – 4, for residential development sites that are:
   a) outside of a Controlled Parking Zone (CPZ) or Restricted Parking Zone (RPZ), where it can be demonstrated through a parking survey that there is sufficient on-street, off-site parking capacity within 200 metres of the development boundary; or
   b) inside an existing or planned CPZ or RPZ, in which case the applicant will normally be required to enter into a legal agreement to restrict future occupiers from obtaining on-street parking permits.

3. For residential developments of fewer than 10 units, where the spaces per dwelling calculation results in a fraction of a space, provision will be rounded up to the nearest whole space.

4. For specialist housing for older people, the standards should be:
   a) a maximum of 1 car space for every 6 residents (for visitors);
   b) a minimum of 1 car space for every 2 staff full time equivalents (FTE) for non- resident staff and visiting health care workers. Further spaces may be required to support additional demand, to be determined through a transport statement or assessment.

5. Parking for industrial development should be provided in line with projected need, calculated via a transport assessment once applicants have demonstrated they have minimised parking requirements through a delivery and servicing plan, parking management plan and travel plan.

Local variations to London Plan parking standards

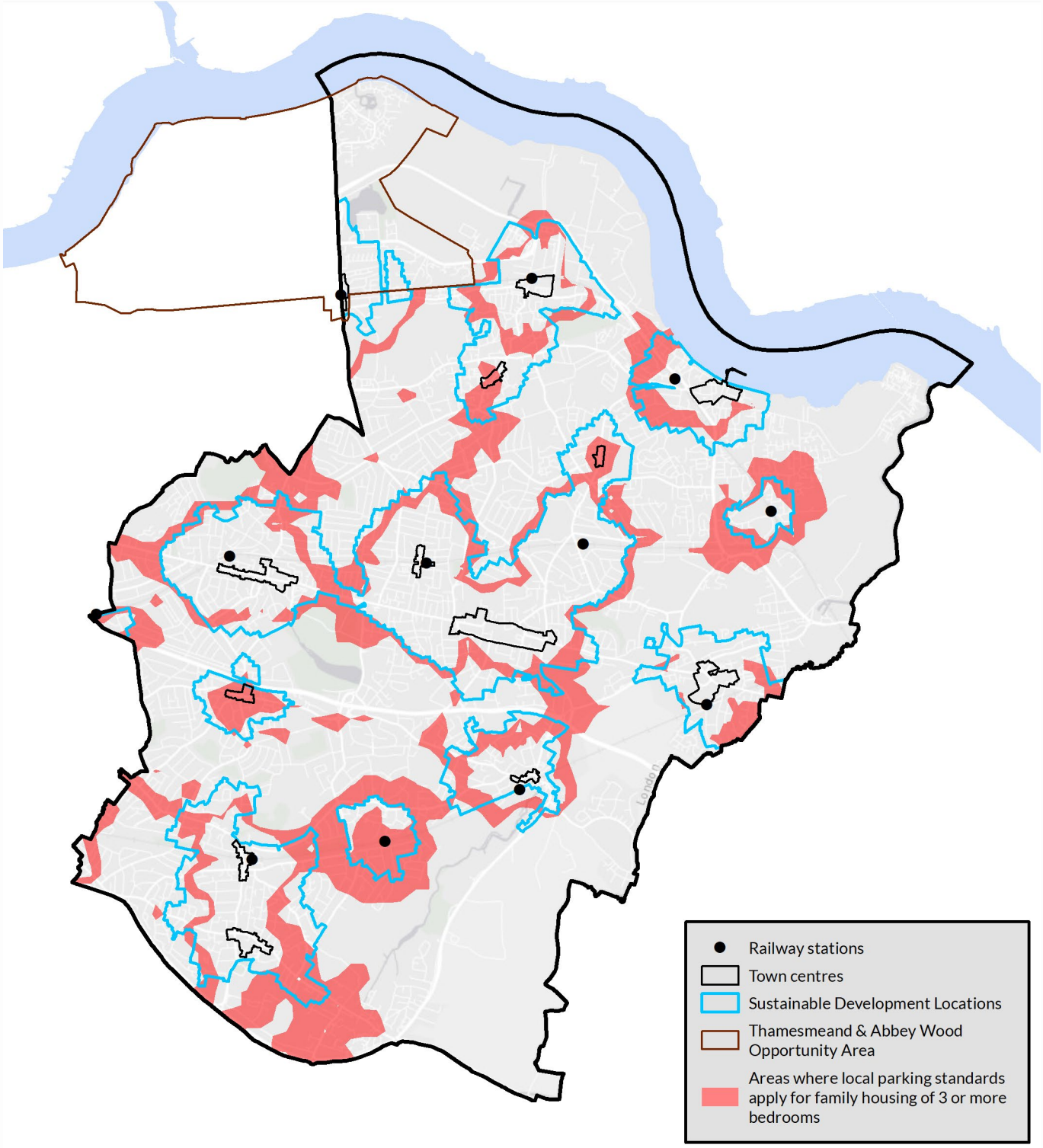


Figure 11: Application of local parking standards across the borough

Policy implementation

6.47 This policy has been informed by and compliments policy SP1 and the spatial strategy. The methodology for determining the borough's sustainable development locations, set out in policy SP1, takes into consideration the projected increase in connectivity, including access to shops, services and facilities within the borough's town centres.

6.48 Developments must provide a level of parking that does not significantly impact on residential amenity, safety, vehicle, cycle or pedestrian flow or access and is appropriately maintained, managed and enforced to achieve these outcomes. This may include mitigating the loss of existing parking where necessary.

6.49 For residential development proposals of one or more (net) new units, the Council may seek a level of parking within the maximum standard, informed by a transport assessment or statement.

6.50 A transport assessment or statement will likely be required from all development proposals to determine the appropriate level of parking. For developments where transport assessments are required, developers will be expected to assess parking provision within the transport assessment, which should demonstrate that demand has been minimised. Designated blue badge parking should be provided in line with the standards in the London Plan for all development types.

6.51 Parking brought forward in connection with major development proposals will need to be accompanied by a car parking design and management plan, which will allow the flexible management of parking provision. The policy ensures that parking standards are locally appropriate, and that provision supports additional family housing, identified in the Bexley SHMA as the main type of housing needed in the borough. Family housing is defined as housing with a minimum of three bedrooms.

6.52 The Council may seek a level within the maximum standards on a case-by-case basis, depending on the scale of the development and local factors including parking stress and general highway conditions. Where a masterplan process has been undertaken, the higher maximum standards set out in part 1 a) and b) may not apply, as informed by the accompanying transport assessment.

6.53 Where required by the Highway Authority, all development proposals will need to demonstrate through a parking survey that sufficient on-street capacity will be able to accommodate comfortably any overspill parking from the development. Surveys will need to include all publicly available parking areas normally within 200 metres of the site. The scope of parking surveys must be agreed in advance with the Council. In order to encourage low car ownership and protect the amenity of residents a legal agreement may be required to restrict future occupiers from obtaining parking permits in a CPZ or RPZ.

6.54 Introducing new or expanding existing CPZ/RPZs creates a financial burden to existing residents and to the Council that must enforce the restrictions. In addition, existing residents may also be affected by other impacts of the new developments in their area. However, in some cases an extension to an existing CPZ/RPZ may be appropriate, subject to local support. Where a development is proposed on the edge of an existing CPZ/RPZ and it is assessed that this will have an adverse impact to on-street parking in the area, then the Council may consider whether an extension to the existing CPZ could be justified, at the developer's expense.

6.55 New specialist housing for older people includes sheltered accommodation (C3), extra care accommodation (C3) and residential/nursing care homes (C2) and each may have slightly different parking needs for residents and visiting healthcare workers. The London Plan has further detail in policy H13. In addition to car parking, consideration should be given to the safe storage of and charging point locations for mobility scooters when designing retirement/sheltered housing developments, and the safe storage of cycles/motorcycles across developments in general. Waiting and turning space should be available for ambulances, dial-a-ride vehicles etc.

6.56 Developers should mark-out an appropriate proportion of spaces at non-residential developments for motorcycle parking, in line with the predicted usage as agreed through the transport assessment or parking management plan.

➲ DP24: Impact of new development on the transport network

Related plans, strategies and key evidence – why we need this policy

Bexley Local Implementation Plan (LIP)
Local Plan Transport Assessment (LPTA)

6.57 The NPPF aims to encourage the development of sustainable transport polices that support the reduction of emissions from greenhouse gases as well as reduce congestion. The guidance requires that local authorities do all that they can to ensure that opportunities to move goods and people using sustainable transport are maximised.

6.58 This policy approach embraces the concept that development proposals must not have a severe impact on transport network operation and efficiency, as set out in the NPPF. It is also important that developers consider transport impacts on local amenity.

DP24 Impact of development on the transport network

1. Proposals that reduce the need to travel and improve access to sustainable modes of transport will be supported.

2. Proposals should not have a significant negative effect on the safety of any users, including vulnerable users of the transport network such as pedestrians and cyclists. Proposals should identify, minimise and mitigate potential negative impacts.

3. Proposals should not have a significant negative impact on the operation or efficiency of the local road network, the Transport for London Road Network or Highways England's Strategic Road Network, the public transport system or local amenity. Proposals should identify, minimise and mitigate potential negative impacts.

4. Development proposals should not result in:

   a) unsuitable use of any road that is prejudicial to its function in the road hierarchy as set out in Table 11 and identified on the submission policies map, or a street according to its position in the movement and place matrix of street types, as set out in the Local Implementation Plan, illustrated by Figure 12, and taking into account the function of adjacent streets; or
   b) severe cumulative adverse impacts on the operation of roads or streets in the area.

Road Hierarchy – road classification network

Road classification	Function within the road hierarchy
Strategic roads	National or regional routes – Transport for London Road Network in this borough (formerly Trunk Roads) – A2 and A20; serving mainly longer distance vehicle movements and connecting all part so Greater London to the national road network
London Distributor Roads	Most other 'A' classified roads in the borough, other than Strategic Roads and some other roads; providing through traffic movements and links to Strategic Roads
Borough Distributor Roads (local distributors)	'B' classified roads other than London Distributor Roads, 'C' classified roads and some unclassified roads; catering primarily for movement within the borough
Local Access Roads	Roads, the principle purpose of which is to provide access to land and buildings in the immediate vicinity; primarily for use by residents and pedestrians

Table 11: Road classification network

Movement and place matrix of street types

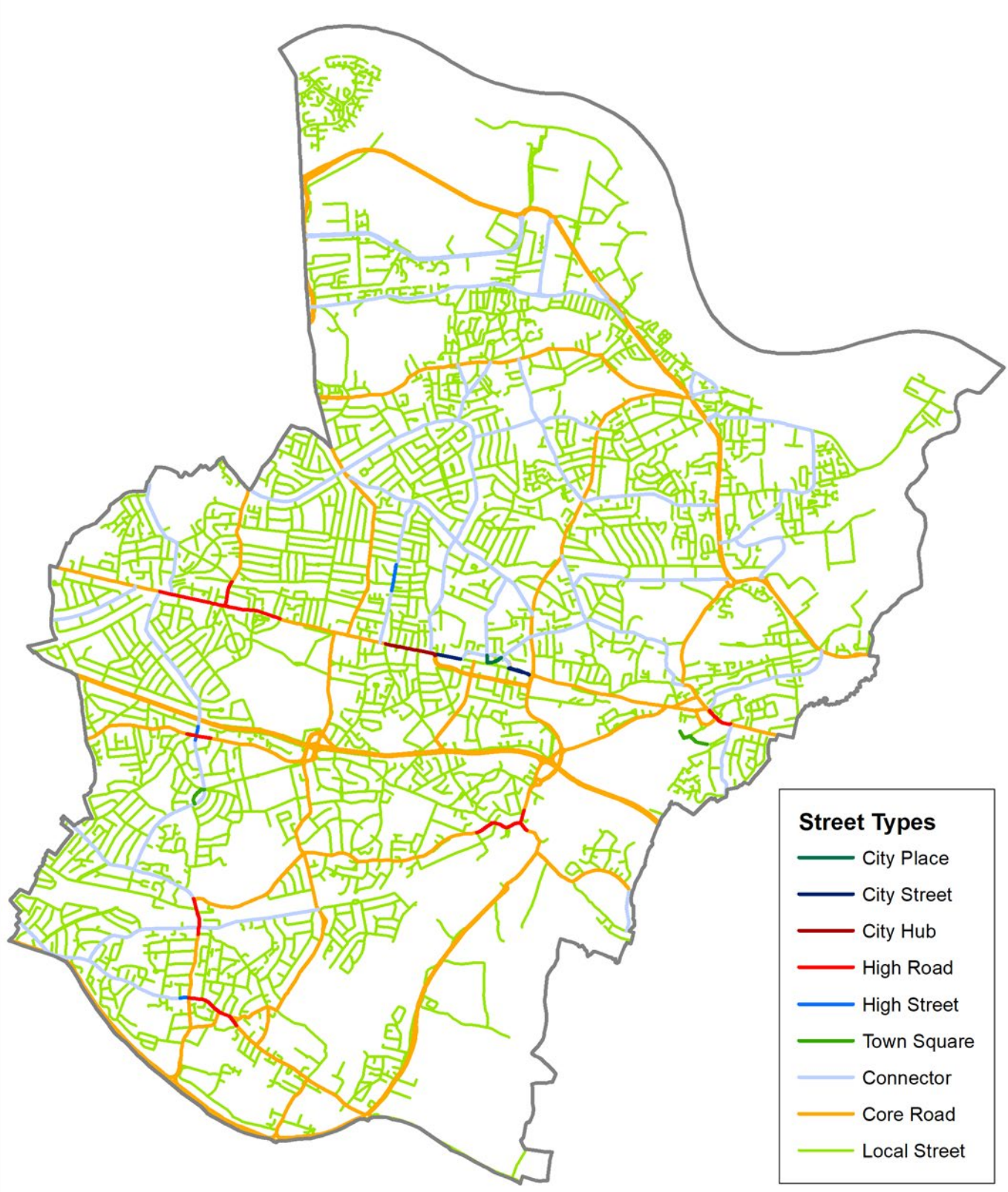


Figure 12: Movement and Place matrix of streets (Source: Bexley Local Implementation Plan)

Policy implementation

6.59 All development proposals likely to generate significant amounts of movement should be supported by a transport assessment or transport statement and a travel plan. Ultimately, these measures will ensure that the impacts of development are appropriately managed and the

opportunities to reduce travel demand and increase access to sustainable transport modes have been taken up as far as practicable and to reduce the need for major transport infrastructure.

6.60 Assessments supporting development proposals should take into consideration the potential impacts of both the proposal itself and the potential cumulative impacts of wider development set out in the Local Plan.

6.61 Transport statements, which have a less extensive scope than full transport assessments can be produced for smaller developments that are also likely to have a material impact upon the surrounding transport network.

6.62 There will be instances where applicants will need to mitigate issues that are directly attributable to their proposal, such as access to public transport, highway safety or capacity. This could include off-site highway improvements to pedestrian and cycle routes to enable access to a local station for example. By doing so an otherwise unacceptable proposal may be made acceptable.

6.63 Where measures are required to address impacts upon highway safety, network efficiency, or amenity (including measures to reduce travel demand, improve access to sustainable modes and monitor outcomes), the Council will expect that the measures be secured either by condition or that the applicant enter into a legal agreement regarding their provision.

6.64 Developers should identify the impacts of development on the transport network and associated mitigation measures through transport assessments. This could include, for example, facilities to assist vulnerable road users, such as crossings, cycle ways and footpaths. Transport assessments should include a construction management and logistics plan, a delivery and servicing plan and a travel plan.

6.65 The purpose of travel plans, delivery and servicing plans, and outline construction logistics plans, is to encourage more efficient use of the transport system and reduce private vehicle use. Safety is also a factor, particularly in respect of construction vehicles, and construction management and logistics plans will be expected to be prepared to the construction logistics and community safety (CLOCS) standards.

6.66 This is achieved through the identification and implementation of various measures such as car sharing or the scheduling of deliveries outside of peak traffic times. Or, during construction, consideration should be given to sustainable transport modes, such as waterborne transport via the borough's safeguarded wharves, for handling construction, demolition and excavation waste. Such measures can make a significant and cost-effective contribution to mitigating development impacts on the transport network. Further guidance is available from TfL.

6.67 The Council will support development proposals that are phased in line with the provision of enabling transport infrastructure or services. The Council encourages developers to engage in pre-application discussions on transport matters at the earliest possible stage. This will help to achieve right first-time applications, reducing the risk of abortive work and associated costs and delays.

6.68 The movement and place matrix of street types is used to establish design principles that influence the use and management of the highway network, particularly in connection with development proposals. The list of street types has been developed from the Mayor's Transport Strategy and Bexley's Local Implementation Plan. All nine types identified in the key occur in the borough, although some only in very few places. The movement and place matrix of street types is set out in Figure 12.

6.69 The roads are also classified according to their function. These are defined in Table 11 and illustrated on the submission policies map.

6.70 Further details and information are set out in Bexley's Highway Authority Developer Guidance and will be included in the Design Guide SPD.

➲ SP12: Sustainable waste management

Related plans, strategies and key evidence – why we need this policy

National Planning Policy for Waste
London Plan Policy SI 8 Waste capacity and net waste self-sufficiency
Southeast London Joint Waste Technical Paper
Bexley Reduction and Recycling Plan

6.71 Waste Planning Authorities such as Bexley have a key role to play in the management of waste, set out in the National Planning Policy for Waste (NPPW). As a London borough, Bexley also has waste requirements set out in the London Plan.

6.72 The Council is committed to promoting a more circular economy by:

- encouraging waste minimisation, including support for repair and reuse facilities
- increasing the efficiency of waste sorting and recycling operations; and
- supporting recovery of energy from waste and diverting it from landfill.

6.73 The construction industry also has an important role to play in the circular economy. The construction and operation of the built environment currently accounts for 60% of UK materials consumption and one third of all waste arisings. For measurable and achievable waste prevention targets to be set, waste generation should be decoupled from economic growth, which is a challenging task.

SP12 Sustainable waste management

1. In new development, the Council will ensure that waste is managed in ways that protect human health and the environment and will follow the principles of the circular economy by applying the waste hierarchy (see Figure 13). Where opportunities arise, this principle will also be applied to existing development, for example for flats above shops where it can be challenging to segregate waste.

2. The Council will support sustainable waste management by:

   a) Implementing the waste hierarchy in its approach to future waste management;
   b) meeting its waste apportionments and other requirements, such as the Mayor's recycling or composting targets, including collaborating with and supporting other London boroughs as appropriate;
   c) safeguarding strategic waste management sites for waste uses as shown on the submission policies map;
   d) supporting regionally significant waste management infrastructure, including the Crossness Sewage Treatment Works; and,
   e) considering the use of planning contributions, including from the borough's community infrastructure levy, to provide better waste management for existing development.

3. The Council will support the development of the circular economy by encouraging the waste and construction industries to:

   a) make resource use more efficient;
   b) reduce the production of waste;
   c) maximise the recycling of waste; and
   d) identify alternative business models.

Waste hierarchy framework

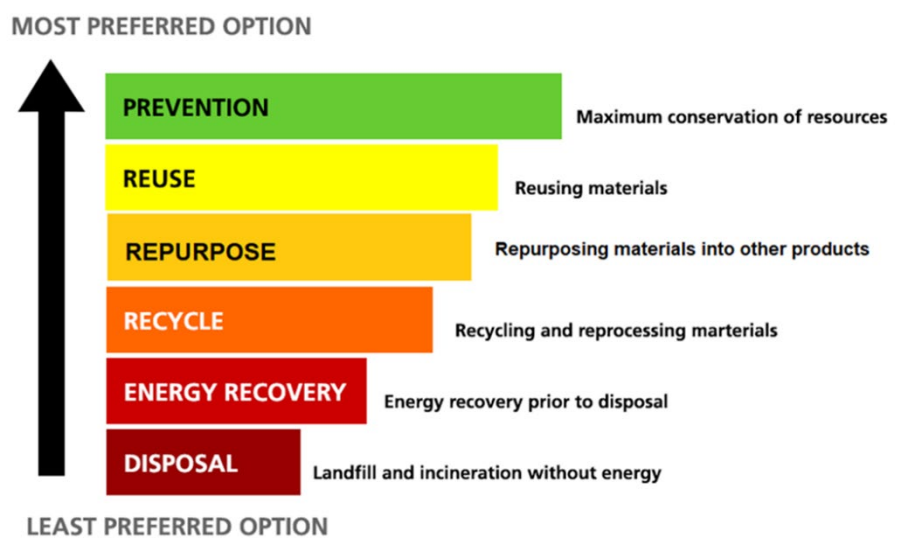


Figure 13: Waste hierarchy, in line with circular economy principles

Policy implementation

6.74 The waste hierarchy (Figure 13) provides a framework for how waste management can be made more sustainable by following circular economy principles. The aim is to move up the waste hierarchy by moving away from a reliance on disposal to increased recovery, recycling, composting, reuse, reduction and ultimately to rethinking products and design so that waste is prevented. Targets for recycling and composting have been set in the Council's waste management strategy, in line with national and regional guidance, and local circumstances and these will be reviewed as appropriate. The waste hierarchy and waste apportionment targets are set out in the London Plan.

6.75 Bexley already has many waste management facilities in the borough and, in partnership with the other southeast London boroughs and the City of London, is self-sufficient across all waste streams except for landfill, which the borough is moving towards a zero-waste to landfill target.

6.76 Safeguarded strategic sites suitable for waste management uses are designated in partnership with the Southeast London Joint Waste Planning Group (London Boroughs of Bexley, Bromley, Lewisham, Southwark, Royal Borough of Greenwich, and the City of London) in order to meet, across the subregion, pooled waste apportionment targets set by the Mayor of London in the London Plan. These sites are set out in the Southeast London Joint Waste Planning Technical Paper (a shared evidence base that is kept up-to-date when each partner borough submits a local plan) and designated on the submission policies map.

6.77 Waste management capacity in the borough exceeds the apportionment assigned to Bexley in the London Plan. Because of this, Bexley has formally accepted responsibility for meeting the waste management capacity for London Plan waste apportionment requirements identified for the City of London and Westminster. Therefore, Bexley brings a higher apportionment requirement into its collaborative working with the other southeast London waste planning authorities.

6.78 In addition, the Council may enter into joint waste planning arrangements with other London boroughs, as appropriate, to make the most efficient use of any surplus capacity after London Plan apportionments have been applied. This can happen unilaterally or in partnership with the Southeast London Joint Waste Planning Group.

DP25: New waste management facilities and extensions and alterations to existing facilities

Related plans, strategies and key evidence – why we need this policy

National Planning Policy for Waste
London Plan Policy SI 8 Waste capacity and net waste self-sufficiency
Southeast London Joint Waste Technical Paper
Bexley Reduction and Recycling Plan

6.79 Bexley has one of the highest numbers of permitted waste sites in London. There is currently a range of waste management facilities in the borough, licensed to store and process various waste streams, and it is considered that a mix of options is generally needed to arrive at the most balanced environmental, social and economic solution for sustainable waste management. The borough's strategic waste management facilities have therefore been safeguarded for this purpose and are identified on the submission policies map.

6.80 However, there are some facilities that are not suitably located and there can also be issues with poor environmental standards that can cause multi-agency issues. There is therefore is a clear need for local policies to address any of this issues that are planning matters.

DP25 New waste management facilities and extensions and alterations to existing facilities

1. Development proposals for new waste management facilities, or for extensions and alterations to existing facilities, must demonstrate that they will contribute to the Council's strategic approach of moving waste up the waste hierarchy (see Figure 13) and that the type of facility proposed is needed in the local area in line with the proximity principle and the self-sufficiency principle.
2. Designated strategic industrial locations (SIL) are appropriate locations for new waste management facilities, however consideration will be given to adjacent businesses within SIL and nearby land uses such as for residential or nature conservation, using the Agent of Change principle. A sequential approach to locating new waste facilities should be applied and locations chosen only were there are no significant adverse impacts. and a preference given to parts of SIL that have the least detrimental impact on other businesses or land uses.
3. Development proposals will be assessed using locally specific criteria, having regard to the requirements of UK legislation, the Government's policies on waste and the Mayor's London Plan, including impacts of the proposal on the local environment and residential amenity.
4. All new waste facilities with the potential to have a negative impact on amenity of surrounding areas should be fully enclosed on all sides and have a roof and fast-acting doors or provide equivalent environmental protection.
5. Proposals for new facilities, extensions and alterations should be well designed and contribute positively to local character.

Policy implementation

6.81 Given the significant amount of surplus waste capacity in Bexley, applicants proposing new waste facilities in the borough must demonstrate that they are necessary to be located in Bexley (e.g. that they meet the proximity principle and self-sufficiency principle) and that the envisaged facility will not undermine the waste planning strategy through prejudicing movement up the waste hierarchy.

6.82 Criteria for considering the potential impact of the development proposal for a new facility, an extension or alteration are set out in the National Planning Policy for Waste and the London Plan.

The Council has applied these to its designated SIL to determine the best locations within SIL for new waste management facilities. Therefore, proposals for development of new waste management facilities will be assessed to determine that they are in an appropriate location.

6.83 Waste management facilities have the potential to pollute the environment through emissions to air, releases to ground and surface water and leaving a legacy of contaminated land. Development proposals, including extensions to existing facilities, should be for fully enclosed facilities. Impacts will be assessed against local criteria including: amenity considerations, traffic movements and the existence of protective designations such as nature conservation, and protection of water resources. The Design Guide SPD will set out detailed principles for the design of waste facilities.

➲ DP26: Waste management in new development

Related plans, strategies and key evidence – why we need this policy

National Planning Policy for Waste
London Plan Policy SI 7 Reducing waste and supporting the circular economy
Bexley Reduction and Recycling Plan

6.84 In order to facilitate recycling, to meet London Plan waste management targets, while protecting visual and residential amenity and public health, proposals for residential development should include detailed consideration of waste arising from the occupation of the development including consideration of how waste will be stored, collected and managed. It is equally important that when new development is being constructed, that circular economy principles are being applied.

DP26 Waste management in new development

1. All proposals for major development (defined in the Glossary) should promote circular economy outcomes and aim to be net zero-waste. Applications should include a circular economy statement in accordance with London Plan policy SI 7 the London Plan.

2. Residential development proposals that provide additional housing, including conversions, should ensure that:

Flatted development

a) there is adequate space within each flat/apartment for the temporary storage of waste generated by that flat/apartment allowing for the separate storage of recyclable materials;
b) there is adequate communal storage for waste, including separate recyclables, pending its collection;
c) storage and collection systems (e.g. dedicated rooms, storage areas and chutes or underground waste collection systems) for waste are of high-quality design and are incorporated in a manner which will ensure there is adequate and convenient access for all residents and waste collection operatives and will contribute to the achievement of London Plan waste management targets;
d) measures are incorporated to manage, to acceptable levels, impacts on amenity including those that may be caused by odour, noise, and dust;
e) the on-site treatment of waste has been considered and any system to be incorporated will take into account the factors listed above and other relevant development plan policies; and
f) adequate contingency measures are in place to manage any mechanical breakdowns;

Other residential development

g) there is adequate space within each residential property for the temporary storage of waste generated by that residence allowing for the separate storage of recyclable materials; and

DP26 Waste management in new development

h) there is adequate external storage space for waste, including separate recyclables, pending its collection.

3. Proposals for new development should be accompanied by a recycling and waste management strategy that considers the above matters and demonstrates the ability of the new development, once occupied, to meet local authority waste management recycling targets.

Policy implementation

6.85 The London Plan sets requirements for waste management in all types of development. Circular economy principles should be incorporated into the design of developments, in order to extend the useful life of buildings and allow for materials to be reused or recycled.

6.86 Appropriate types of storage and collection systems for waste will depend on the type of residential development proposed. Other residential development includes HMOs, live/work accommodation and residential institutions, including specialist housing for older people, and student accommodation.

6.87 Local guidance will be set out in the Design Guide SPD and developers and applicants are expected to liaise with the Council's waste services team where there are any difficulties with layouts of schemes. The London Waste and Recycling Board's Waste Management Planning Advice for New Flatted Properties 2014 also provides guidance.

➲ DP27: Minerals and aggregates

Related plans, strategies and key evidence – why we need this policy

National planning policy and guidance on minerals planning
London Plan Policy SI 10 Aggregates
British Geological Survey mapping for Bexley

6.88 Minerals and aggregates are a non-renewable resource, of particular importance to the construction industry, and as such they require protection to prevent their unnecessary sterilisation. Minerals are sterilised when their future extraction is prevented through non-minerals development. The NPPF states that Minerals Planning Authorities (MPAs), including Bexley, should designate mineral safeguarding areas (MSA) on their submission policies map.

6.89 London imports most of the aggregates used for construction in the capital; it is therefore vital that sites involved in the transport and handling of aggregates are also safeguarded.

DP27 Minerals and aggregates

1. Land designated as aggregates sites and facilities on the submission policies map will be safeguarded for its existing use for transportation, distribution, processing and/or production of aggregates and minerals, unless it can be demonstrated the use is no longer required or economically viable.

2. All development proposals should consider how the re-use and recycling of construction, demolition and excavation waste materials can be maximised on-site or, if this is not possible, within London.

3. All minerals exploration and extraction proposals will be expected to demonstrate that:

DP27 Minerals and aggregates

a) there will not be an unacceptable adverse impact on the natural, built and historic environment, on public health and safety, and the amenity and quality of life of nearby communities and suitable measures and controls will be put in place to mitigate any adverse impacts; and
b) there are satisfactory proposals for the restoration and aftercare of the site in order to ensure an appropriate and beneficial re-use; including recreational, leisure and other related uses that have a wider public benefit.

4. Restoration proposals should improve the environment, with particular regard to the quality of soil, water, biodiversity and geodiversity, as well as flood risk, land stability and landscape character.

Non-minerals development

5. Planning permission will not be granted for non-mineral development that would lead to the unnecessary sterilisation of mineral resources within a Mineral Safeguarding Area, as defined on the submission policies map, unless:
   a) The applicant can demonstrate to the satisfaction of the MPA that the mineral concerned is not of economic value; or
   b) The mineral can be extracted to the satisfaction of the MPA without unacceptable community and environmental impacts prior to the development taking place; or
   c) The development is exempt because it consists of:
      i. alteration/extensions to existing buildings;
      ii. householder applications;
      iii. change of use;
      iv. prior notifications; or
      v. advertisements.

Policy implementation

6.90 An MSA has been designated on the submission policies map. This is an area where the presence of mineral reserves (predominantly sand and gravel) has been indicated by British Geological Survey mapping, and where there is potential for mineral extraction. For practical reasons, urban areas have been excluded from the MSA. However, the Council would be supportive of any viable opportunities for extraction of minerals prior to development in these areas.

6.91 Designating an MSA does not, in and of itself, preclude non-minerals development from being permitted in these areas, nor does it create a presumption that the mineral will be worked or indicate predetermined support for grant of consent for minerals development. An MSA does however act as a flag that minerals may be sterilised by non-minerals development and that this should be taken into account in the planning process.

➲ DP28: Contaminated land and development and storage of hazardous substances

Related plans, strategies and key evidence – why we need this policy

National Policy Statement for Hazardous Waste
London Plan Policy SI 7 Reducing waste and supporting the circular economy

6.92 Industrial activity, waste disposal, accidental spillages and transportation can cause contamination of land. Where waste products or residues remain within soils or groundwater, they may present a

hazard to people and the general environment and preclude some classes of development from taking place. This policy approach seeks to mitigate this risk.

DP28 Contaminated land and development and storage of hazardous substances

1. Where development is proposed on contaminated land or potentially contaminated land, a desktop study and site investigation, including appropriate proposals for remediation will need to be carried out where required.

2. Development proposals for hazardous installations and development proposals within the relevant consultation zones for existing hazardous installations must consult with the Health and Safety Executive (HSE).

Policy implementation

6.93 Bexley has a long history of industrial and other development and land contamination is one of the legacies of this. Therefore, the Council will require applicants to survey sites that are known or suspected to be contaminated to determine the source of any pollutants and any remedial measures necessary to prevent these causing hazards either during construction or through subsequent use of the site. Desk study and site investigation should be carried out in line with current guidance. The Council may require applicants to enter into an appropriate condition/legal agreement to ensure that the necessary remedial measures are made.

6.94 The Health and Safety Executive (HSE) sets a consultation distance around every site with hazardous substances consent and notifies the relevant local planning authorities. Whenever a hazardous waste development is proposed within any consultation distance, the applicant should consult the HSE for its advice on locating the development there.

6.95 In addition, there are installations in the borough, such as gasometers and associated pipelines, where there is a requirement to notify the Health and Safety Executive (HSE) if a development proposal falls within a specific distance of these installations.

➲ SP13: Protecting and enhancing water supply and wastewater infrastructure

Related plans, strategies and key evidence – why we need this policy

National Policy Statement for Wastewater
London Plan Policy SI 5 Water infrastructure

6.96 Crossness Sewage Treatment Works (CSTW) is Thames Water's second largest sewage treatment works and is located in Thamesmead. CSTW is regionally strategic infrastructure, serving not only Bexley but surrounding areas. Therefore, the level of future capacity will also depend in growth in these areas. CSTW drains 10% of Bexley's sewerage, the remaining 90% drains to Long Reach STW in Dartford.

6.97 It is likely that CSTW will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Water and sewerage infrastructure development may therefore be necessary in flood risk areas.

6.98 Increased amounts of development can lead to reduced water quality through pollution of ground or surface water, including pollution to underground water resources. Poor water quality can have a range of environmental impacts including impacting on the borough's wildlife.

6.99 Bexley is bordered by the Halfway and Erith reaches of the Thames Estuary to the north. This is the most significant waterway in the catchment. The large London sewage treatment works of Crossness (in Bexley) and Beckton (on the northside of the Thames in Newham) are the main factors that influence of water quality in these reaches, where dissolved oxygen levels can be a problem in the summer. Significant improvements to these works over the next 10 years are expected to improve estuarine water quality in the Thames. Other surface water bodies in the borough consist of artificial dikes draining Thamesmead and the River Cray to the east.

6.100 The Environment Agency routinely monitors the chemical and biological quality of the Rivers Cray and Darent and their tributaries, classifying the ecological quality of the rivers to be poor to moderate and the chemical quality of the river to be good in 2016.

6.101 There are two classified rivers in Bexley: the River Shuttle and the River Cray. The classifications of the rivers are based on the Thames River Basin Management Plan. The River Shuttle has been classified as poor ecological status, and the River Cray has been classified as moderate ecological status. These need to achieve good ecological potential. A programme of measures to improve the status is being developed by the Environment Agency. The key issues include:

- point source pollution from water industry sewage works;
- physical modification of water bodies;
- abstraction;
- diffuse pollution from urban sources.

6.102 As climate change continues to influence our water supplies via summer droughts and increased winter rainfall, and in the face of a large housing growth agenda, it is critical that local authorities implement water conservation measures through their Local Plans.

SP13 Protecting and enhancing water supply and wastewater infrastructure

1. The Council will:
   a) work with Thames Water in relation to local wastewater infrastructure requirements and support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts;
   b) promote improvements to water supply infrastructure, particularly within the defined sustainable development locations, to contribute to security of supply in a timely, efficient and sustainable manner taking energy consumption into account;
   c) promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, taking account of catchment plans;

Crossness Sewage Treatment Works (CSTW)

   d) support the protection of CSTW, as a key infrastructure asset, from the risks of flooding;
   e) promote public access to the Thames Path through the CSTW and the conservation and enhancement of the Crossness Beam Engine House, including the site and buildings within its curtilage, and seek to affect these by means of planning obligations in the event of substantial planning permissions being contemplated in the vicinity.

Policy implementation

6.103 River catchment partnerships operating on rivers running partly or fully through the borough include the Tidal Thames also known as Your Tidal Thames, Marsh Dikes and Thamesmead, and the Darent and Cray. The purpose of these partnerships is to develop and deliver catchment plans.

Partnerships work to actively involve communities and other stakeholders in restoring their local rivers, tackling pollution, managing invasive species, and improving access to rivers.

6.104 The operational land for CSTW is identified on the submission policies map.

➲ DP29: Water quality, supply and treatment

Related plans, strategies and key evidence – why we need this policy

London Plan Policy SI 5 Water infrastructure
Thames River Basin Management Plan

6.105 There are many things that can affect the quality of our water supply. Sewers, for example, that have been incorrectly connected to the network, or not connected at all, can allow untreated wastewater to discharge into rivers. Road and rail represent the predominant modes of transport within Bexley and both modes have the potential to contaminate both land and groundwater. Potential leakages, spillages of fuel oils, particulate emissions from vehicle engines and tyre dust generated may form a residue on road surfaces, which may be transferred to land and groundwater via surface water run-off. In addition, potential spillage and leakage of diesel from passenger and freight trains, as well as brake dust generated, can also transfer to pollutants to watercourses and groundwater via surface run-off. Pollutants from industrial land can also run-off into rivers and watercourses.

6.106 The potential for climate change to result in more intense rainfall during the summer months and a wetter winter season in the UK is likely to affect the borough's water quality. Currently, water quality in London's rivers is assessed as 'moderate' to 'poor' with only a small number of water bodies classed as 'good.' Surface water run off can cause sewer overflow to the detriment of water quality in the Thames and its tributaries. The potential for rainwater to carry hydrocarbons, metals, dust, litter and organic materials into watercourses as it washes the urban streets and buildings poses a threat to the water quality at local watercourses.

DP29 Water quality, supply and treatment

Water quality

1. Development proposals should not adversely affect the quality or quantity of water in watercourses or groundwater. New development will be required to enhance and protect the water quality of existing water resources, such as watercourses and groundwater.

Water supply and wastewater/sewage infrastructure

2. Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.

3. The Council will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Council will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.

DP29 Water quality, supply and treatment

4. All development proposals must provide on-site treatment or a connection to the sewerage system at the nearest point of adequate capacity, as advised by the service provider, and ensure future access to the existing sewerage systems for maintenance and upsizing purposes.

Development within the vicinity of Crossness Sewage Treatment Works

5. When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that:

   a) there is no adverse amenity impact on future occupiers of the proposed development or;
   b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.

Policy implementation

Water quality

6.107 There is increasing concern for the protection of the water environment, which not only serves as a source of water but provides essential habitats and a valued resource for leisure and recreation. New development must ensure that there are no direct or indirect adverse effects on the quality of water supplies, and it will not be permitted unless measures are included which would overcome any threat, to the satisfaction of the Council, in consultation with the Environment Agency (or equivalent) and other appropriate authorities.

6.108 Measures to avoid polluting the borough's waterways including groundwater resources will need to be included within a scheme where appropriate. Methods to avoid polluted runoff, for example from petrol chemicals and salts into waterways, need to be considered in planning applications adjacent to waterways, along with the use of SUDs.

Water supply and wastewater/sewage infrastructure

6.109 Development should improve water quality, addressing issues such as wrong connections and removing pinch-points that can contribute to poor water quality and localised flooding.

6.110 The development or expansion of water supply or wastewater facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.

Development within the vicinity of CSTW

6.111 Development in the vicinity of Crossness STW will be expected to undertake an odour, noise and vibration impact assessment, where required, and respond with appropriate mitigation as necessary.

6.112 Where development is being proposed within 800m of a sewage treatment works, the developer should liaise with Thames Water and the local authority to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.

6.113 Where development is being proposed within 15m of the sewage pumping station, the developer should liaise with Thames Water and the local authority to consider whether an odour and / or noise and / or vibration impact assessment is required as part of the promotion of the site and potential planning application submission. Any impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a pumping station.

6.114 The impact assessment would establish whether new resident's amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer.

7. Bexley's climate: adapting to and mitigating the effects of climate change

Related Council overarching strategies

Bexley Growth Strategy

7.1 Climate change mitigation refers to efforts to reduce or prevent emission of greenhouse gases (GHG). These emissions are altering the composition of the atmosphere and contributing to climate change. Carbon dioxide (CO2) is the most abundant GHG globally, and concentrations in the atmosphere have risen dramatically.

7.2 This chapter sets out the strategic and non-strategic policies to address climate change and how it should be dealt with in a coordinated manner as proposals for new development come forward, taking account of the policies already in the London Plan.

7.3 Mitigation can mean using new technologies and renewable energies, making older equipment more energy efficient, or changing management practices or consumer behaviour. Recycling, greater resource efficiency and circular economy business models offer huge scope to reduce emissions. Taking strong action on emissions can deliver substantial net benefits to local communities. Government research has found that such action can improve people's health, reduce energy costs, create employment, enhance community cohesion and restore local ecosystems.

7.4 Climate adaptation refers to the actions taken to manage impacts of climate change by reducing vulnerability and exposure to its harmful effects and exploiting any potential benefits. A wide range of adaptation options are available in urban areas to reduce the risks to natural and managed ecosystems, the risks of sea level rise, and the risks to health, livelihoods, food, water, and economic growth (e.g. green infrastructure, sustainable land use and planning, and sustainable water management).

7.5 Climate change is a global issue; the Paris Agreement 2015 brings almost all nations into a common cause to undertake ambitious efforts to combat climate change and adapt to its effects. Under the Paris Agreement 2015 the UK is committed to following a decarbonisation pathway that aims to limit the global average temperature increase to 1.5°C, while ensuring it is held to "well below" 2°C, by taking steps reflecting its "highest possible ambition." The Intergovernmental Panel on Climate Change (IPCC), representing a large body of reputable, international scientists, has reported for several decades that the global climate is changing.

7.6 The Council signed up to the Nottingham Declaration in 2001, stating its commitment to tackling climate change. In 2019, the UK passed legislation to revise the Climate Change Act target to an emissions reduction of "at least 100%" by 2050 ('net zero'), in line with the advice of the Committee on Climate Change (CCC). The Mayor of London has also committed to making London a zero-carbon city by 2050. Action to help tackle climate change must also be taken a local level in Bexley to help deliver on these commitments.

7.7 The effects of this change include rising temperatures and sea levels, retreating ice, and increases in the number of severe weather events, including extended period of dryness and heat in the summer which could lead to droughts: and heightened flood risk due to more intensive and prolonged rainfall, particularly in winter months.

SP14: Mitigating and adapting to climate change

Related plans, strategies and key evidence – why we need this policy

Thames Estuary 2100 (TE2100) Plan
Charlton to Crayford Integrated Water Management Strategy
Bexley Local Flood Risk Management Strategy
Bexley Strategic Flood Risk Assessment, Level 1
Strategic Flood Risk Assessment – Sequential and Exceptions Tests Technical Paper
Bexley Sustainable Drainage Design & Evaluation Guide
Bexley Green Infrastructure Study

7.8 The consequences of climate change for the UK includes dangerous flood events, increased deaths due to high summer temperatures, migration of native and invasive species, and habitat loss (UK Climate Projections 2018 (UKCP18)). Such environmental effects may also have significant socio-economic and health implications, particularly for regions across the country less able to adapt.

7.9 The geographical location of the borough and population density means that, alongside the rest of London and southeast England, it is likely to suffer from some of the severest impacts of climate change in the UK. One of the effects of climate change is an increased risk of flooding and approximately one quarter of the borough is at risk from tidal or fluvial flooding. The risk is not just from the Rivers Thames, Cray and Shuttle, but includes surface water flooding. As such, even parts of the borough that are outside of the Environment Agency's flood zones are at greater risk than others.

7.10 Reducing overall energy consumption and being more energy efficient is vital to reducing GHG emissions and contributing to a secure energy future. Reducing energy consumption through more efficient buildings and appliances can also help to tackle issues of energy affordability and fuel poverty. Applying circular economy principles – reuse, remanufacture and recycle – to the built environment will also reduce GHG emissions.

7.11 This will be achieved by mitigating the causes of climate change through reducing emissions and sequestering carbon; and, adapting to the effects of climate change by reducing vulnerability and adjusting to change. Whilst the Plan, taken as a whole, is designed to secure that the development and use of land in Bexley contributes to the mitigation of, and adaptation to, climate change, this strategic policy brings a number of key requirements together.

SP14 Mitigating and adapting to climate change

1. The Council will actively pursue the delivery of sustainable development by:
   a) supporting developments that achieve zero-carbon and demonstrate a commitment to drive down greenhouse gas emissions to net zero;
   b) administering the borough's carbon offset fund, ring-fencing payments to implement projects that deliver greenhouse gas reductions;
   c) investigating opportunities for the funding and development of decentralised energy networks in the borough; and, supporting the provision of infrastructure, including safeguarding routes and land for such use, where necessary;
   d) supporting new and enhanced green infrastructure, including greening of development sites such as living roofs, and the contribution green infrastructure can make to managing flood risk and surface water, and to the mitigation of the urban heat island effect;

SP14 Mitigating and adapting to climate change

e) supporting integrated water management (IWM) through a coordinated and holistic approach to land and water management, including managing water storage, supply, wastewater, flood risk, quality of watercourses and water bodies and the wider environment;
f) applying the recommendations of Bexley's Strategic Flood Risk Assessment, Local Flood Risk Management Strategy, and Integrated Water Management Strategy;
g) directing new development into the most sustainable locations by applying the flood risk sequential test across the borough and the exception test to the site allocations in this Local Plan;
h) following the sequential approach to flood risk management advocated in national planning policy and its associated practice guidance;
i) working with the Environment Agency and others to ensure the recommendations of the TE2100 Plan are implemented in new and existing developments, to keep communities safe from flooding in a changing climate and improving the local environment; and,
j) supporting the protection of key infrastructure assets from the risks of flooding.

Policy implementation

7.12 Proposals for zero carbon and zero carbon ready developments are strongly supported, including the sustainable retrofitting of existing development with provisions for the reduction of carbon emissions. The Council will promote and support the requirements and targets set out in national and regional planning policy and guidance, in particular the requirements set out in the Mayor's London Plan regarding reducing carbon dioxide emissions, flood risk management and sustainable drainage methodologies, as well as policies in this Local Plan.

7.13 Planning for water provides opportunities to design the urban environment to be greener, healthier, more biodiverse and more resilient to climate change. Identifying the best type of and locations for integrated water management measures, such as sustainable drainage systems and rainwater harvesting, should start from the master planning stage, informing the design process. The Bexley Sustainable Drainage Design and Evaluation Guide provides further details.

7.14 Securing appropriate IWM interventions for new developments can provide multiple benefits, including reduced risk from flooding, increased water efficiency and reduced water stress, clean and good quality water environment, enhanced biodiversity, enhanced blue and green infrastructure, improved public spaces and places, contributing health and wellbeing, mitigating and adapting to climate change, using resources more sustainably and effectively, enables new housing and facilitating economic growth and regeneration.

7.15 By taking a risk-based approach to the location of development in the borough, the Council will seek to avoid, where possible, flood risk to people and property. The flood risk sequential test has been applied to the whole local planning authority area, and the flood risk exceptions test applied to the site allocations in this Local Plan. The sustainable development locations set out in policy SP1 and illustrated on the key diagram (Figure 1) are the parts of the borough that have passed the sequential test, ensuring that the amount of growth set out in this Local Plan can be accommodated and mitigating risks through design solutions.

➲ DP30: Mitigating climate change

Related plans, strategies and key evidence – why we need this policy

London Environment Strategy

7.16 New development is required to incorporate design features that help deliver radical reductions in greenhouse gas emissions, particularly CO2 emissions, and thus help mitigate climate change impacts. This will be achieved using the measures set out below and in the London Plan unless superseded by national policy or legislation.

Energy reduction in buildings

7.17 Reducing greenhouse gas emissions such as carbon dioxide (CO2) is critical in limiting the impacts of climate change. In 2008, the Climate Change Act set a legally binding target for reducing UK CO2 emission by at least 80 per cent by 2050. It also allowed for a Committee on Climate Change to be set up to create binding carbon budgets for five-year periods.

7.18 The first three carbon budgets aimed to achieve a 34% reduction by 2020. This target represented an appropriate UK contribution to global emission reductions consistent with limiting global temperature rise to as little as possible above 2°C. However, the findings of the 2018 'Special Report: Global Warming of 1.5°C' from the IPCC concluded global temperature rise should be limited by 1.5, not 2°C. In addition, in the 2015 progress report to Parliament, the Committee on Climate Change acknowledged for the first time that the country was not doing enough to meet its carbon targets and that new, stronger policies would be needed to meet the existing fourth carbon budget and to stay on track for the 2050 target.

7.19 The London Environment Strategy explains that the Mayor of London has re-establish London's position as a leader in tackling climate change by setting an ambition for London to become zero carbon by 2050. Making London zero carbon will require economy-wide decarbonisation. This will involve changes to the way in which Londoners travel, work and live, including how energy is sourced and generated. Energy efficiency will have to increase dramatically, leading to homes and workplaces being highly insulated. This is reflected in The London Environment Strategy.

7.20 The Government's future homes and future buildings standards set out plans to radically improve the energy performance of non-domestic and buildings and dwellings through changes to building regulations, with all homes to be highly energy efficient, with low carbon heating and zero carbon ready by 2025. With this in mind, and the knowledge that the NPPF states that places should be shaped in ways that contribute to "radical reductions in greenhouse gas emissions", the urgency for action becomes clear.

Sustainable Design Standards

7.21 The NPPF directs planning authorities to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme and advocates the use of assessment frameworks (paragraph 129) such as sustainability standards. Many international and national standards are available for use, the best known of which is the Building Research Establishment Environmental Assessment Method, or BREEAM. The BREEAM family of standards include standards for:

- The build, refurbishment and operation of non-residential development;
- The masterplanning of major development (BREEAM Communities);
- Public realm works (CEEQUAL);
- The build, refurbishment and operation of residential development (Home Quality Mark).

7.22 Further standards include Passivhaus and Building for Life (see detailed guidance by the Design Council.

Water efficiency

7.23 Water is supplied to customers in Bexley by Thames Water, the largest water supplier in London. Water resources are already under pressure in London and the south east with a risk of a drought if there are two consecutive dry winters. Severe droughts may have significant economic social and potentially health implications.

7.24 The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change.

7.25 Water conservation and climate change is an important issue. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. To successfully proceed with housing growth, water efficiency initiatives are vital to reduce people's daily water use and maintain a supply-demand balance.

DP30 Mitigating climate change

Energy reduction in new buildings

1. Major development proposals must meet London Plan requirements and calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

2. Minor development proposals should aim to achieve net zero carbon; reducing greenhouse gas emissions in operation and minimising annual and peak energy demand in accordance with the London Plan energy hierarchy.

Sustainable design standards for all development

3. The Council expects that, where possible:
   a) new homes be designed to achieve:
      i. BREEAM Home Quality Mark (HQM), or
      ii. BREEAM Communities standards (for major housing-led mixed-use development), or
      iii. Passivhaus, or
      iv. other appropriate sustainability measures.
   b) residential conversions, refurbishment, extensions and changes of use should be designed to achieve BREEAM Domestic Refurbishment Excellent or other appropriate sustainability measure.
   c) new non-residential development, refurbishment of existing buildings, and conversions, over 500m^2 floor space (gross) must meet or exceed BREEAM 'excellent' rating;
   d) minor non-residential development achieves a BREEAM 'Very Good' rating;

Water efficiency

4. Development must be designed to be water efficient and reduce water consumption. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits.

Policy implementation

7.26 Developments must maximise potential to achieve zero carbon or be zero carbon ready to ensure that buildings can become fully zero-carbon over time as the electricity grid decarbonises without the need for further costly retrofitting.

7.27 Compliance with this policy should be demonstrated with a design stage Energy Strategy Report, which is revisited during the construction phase to confirm its predictions are still valid and thus help avoid a 'performance gap.' Both submissions should contain adequate information to demonstrate how the energy hierarchy has been followed. The level of detail provided should be proportionate to the size of the development. Energy Strategies and Whole Life-Cycle Carbon Assessments should contain the information prescribed within the London Plan.

7.28 The Building Research Establishment Environment Assessment Method (BREEAM) provides national sustainability standards for residential and non-residential buildings in order to assess their environmental performance. The Home Quality Mark is one way of demonstrating the standard of a new residential dwelling, which includes measures for low carbon dioxide (Footprint Quality Indicators), sustainable materials, good air quality and natural daylight. The Council strongly encourages all schemes, including self-contained residential proposals, to use the Home Quality Mark.

7.29 Developers must begin work to obtain the required design standard at an early stage in the design process so that benefits can be maximised, and this should be demonstrated in a Design and Access Statement. These standards allow some flexibility in meeting the sustainability policy requirements, which will be assessed on a site by site basis. This may apply, for example, if a developer can demonstrate that the standards would restrict their ability to achieve a truly exceptional or innovative design (as set out in para 79 of the NPPF).

7.30 This policy details the circumstances under which sustainable design standards are expected to be met in the borough. Development proposals that exceed the expectations will be strongly encouraged, subject to all other material considerations being acceptable. The Council is aware that design standards are occasionally updated in order to drive up standards. If a developer's chosen design standard undergoes a nationwide uplift in expectations, the equivalent replacement requirements will be applied.

7.31 Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.

DP31: Energy infrastructure

Related plans, strategies and key evidence – why we need this policy

National Planning Policy Framework
The London Plan 2021 – Policy SI 3
London Environment Strategy
Thamesmead and Belvedere heat network feasibility study (work package 2)

7.32 The NPPF states that local planning authorities should design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts.

7.33 Part C of London Plan Policy SI 3 Energy infrastructure states that Development Plans should identify: the need for any necessary energy infrastructure requirements; existing heating and cooling networks; proposed locations for future heating and cooling networks; and opportunities for expanding existing networks as well as establishing new networks.

7.34 The Council is working closely with partners, including the GLA, on the development of a heat network within the borough. This decentralised energy network will capture affordable low carbon heat from waste to energy facilities, supplying it to residential and commercial buildings in the area, in the form of hot water and/or steam through a system of pipes to where it is needed.

7.35 The Bexley Energy Masterplan was commissioned to determine the potential for a district heat network in Bexley. The study centred on the north of the borough, with the total level of heat demand and annual consumption determined for all loads modelled for connection to an initial "Core Scheme" network. It was determined that the Belvedere, Thamesmead and Abbey Wood sustainable development locations (plus limited adjacent existing buildings/sites) could be met via heat offtake from Cory's Riverside Resource Recovery (RRR) Energy from Waste (EfW) facility.

7.36 The Thamesmead and Belvedere heat network feasibility study (work package 2) has considered this further. The best opportunity for a heat network is for the EfW facility to supply heat to estate regeneration schemes in Thamesmead, Abbey Wood and Lower Belvedere, and other new housing or commercial development on the route west along Yarnton Way.

7.37 Feasibility work is continuing in regard to this potential heat network, in order to deliver significant economic, environmental and social benefits. These include facilitating inward investment and new jobs, providing affordable low carbon heat to residents, businesses, industries and the public sector, helping to tackle fuel poverty by reducing heating costs and reducing London's carbon footprint, in line with London Plan policy.

7.38 To facilitate heat transfer for export from Cory's EfW facility, a heat exchange plant has been identified to be located adjacent to the existing turbine hall (150m^2 split across 3 levels). New residential development will retain satellite energy centres with back up plans and thermal stores as they connect along the network; therefore, this will not be required in the main distribution plant.

7.39 In line with Cory's proposed annual availability of 90% for heat offtake, the provision of supplementary heat generation and storage is required to meet year-round demand and is proposed to comprise a mix of centralised and distributed plant. It is proposed to provide supplementary heating plant via a mix of centralised and distributed/local gas-fired boilers. The centralised plant will only provide heat to those buildings that do not have their own localised boilers (3 no. boiler modules 300m^2), and this could be integrated with the heat exchange plant.

Network routing

7.40 The network scheme has been designed around minimising the distance travelled by primary transmission pipes between the largest load centres, as well as avoiding the need to cross major obstacles and utilises a combination of Norman Road and Yarnton Way. To connect into Belvedere, a crossing of the railway line could be through either a dedicated bridge, micro-tunnelling under the line or divert to the Picardy Manorway road bridge.

7.41 Secondary heat exchange located in the premises of residential development plantrooms. Further hydraulic separation would be introduced via the use of heat interface units within or local to individual flats/properties.

DP31 Energy infrastructure

1. Developments within heat network priority areas should be designed to facilitate cost-effective connections to the existing or proposed network in accordance with the London Plan.
2. In designated heat network priority areas, proposals for the development of decentralised energy network infrastructure and related apparatus, including the use of low carbon technology, will be supported.
3. Proposals for major developments that produce heat and/or energy should consider how they can contribute to the supply heat in a designated heat network priority area or demonstrate that this is not technically feasible or economically viable.

Policy implementation

7.42 The Mayor of London has identified Heat Network Priority Areas, which can be found on the London Heat Map website. These identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers.

7.43 The London Heat Map identifies much of the north of Bexley borough, along with areas around Bexleyheath town centre, Welling and Sidcup as Heat Network Priority Areas (HNPAs), which therefore qualify as "competitive" opportunities for heat networks. Data relating to new and expanded networks will be regularly captured and made publicly available, therefore additional areas may be added in the future. Developers should refer to the London Plan policy on energy infrastructure for further requirements.

7.44 To realise significant emissions reduction using district heating, the heat in the networks must be provided from low carbon sources. As the electricity grid also decarbonises, this presents a potential opportunity to use heat pumps to deliver heat from sources to networks and from networks to buildings. New build networks serving thermally efficient buildings are able to operate at lower flow temperatures, thus increasing the efficiency of heat pumps providing heat to the network. The Government has produced a report on Heat Pumps in District Heating

7.45 Renewable energy schemes will be strongly promoted in the borough and encouraged as part of development proposals where they are effective, viable and practical. Applications for renewable energy generation will be expected to demonstrate how the proposal has been sensitively designed to integrate into the local environment, minimising any potential negative impacts, both physically and environmentally.

DP32: Flood risk management

Related plans, strategies and key evidence – why we need this policy

Thames Estuary TE2100 Plan
Strategic Flood Risk Assessment (SFRA), Levels 1 and 2
Strategic Flood Risk Assessment – Sequential and Exceptions Tests Technical Paper
Local Flood Risk Management Strategy

7.46 Bexley is prone to flooding from many sources, such as ground water, surface water, sewer flooding and river flooding ,and climate change could increase the probability and severity of flooding. The Government has a flood map for planning including the designation of flood zones, which address tidal and main river flooding.

7.47 The area of land in Bexley within Flood Zones 2 and 3 is predominantly in the north of the borough, where the risk is tidal flooding from the River Thames. Other areas include the land around the River Cray, along the eastern part of the borough. There are approximately 13,000 properties in areas at risk of flooding in Bexley, mainly from tidal sources. This equates to 12% of all properties in the borough.

7.48 Along with the Royal Borough of Greenwich, Bexley falls within the Thamesmead policy unit in 'action zone 4' of the TE2100 (Thames Estuary 2100) Plan, a strategic document produced by the Environment Agency (EA) that looks to manage flood risk through London and the Thames Estuary. The TE2100 Plan was approved by the Government in November 2012. The land is this area low lying, with ground levels typically two to three metres below high water on spring tides. Flood depths in a surge tide event, that would have the ability to overtop or breach flood defences, could exceed five metres (although this would be an extreme event).

7.49 Whilst the area is therefore very vulnerable to tidal flood risk, the recommended flood risk management policy for the Thamesmead policy unit is to take further action to keep up with climate and land use change so that flood risk does not increase.

7.50 Therefore, the approach will be to manage flood risk through new development opportunities in the area. Planning for flooding brings multiple benefits such as making existing communities more resilient; helping to improve water quality; enhancing biodiversity and recreation opportunities; and helping promote local economic growth through releasing land for development.

7.51 Redevelopment of areas provides opportunities to improve flood risk management arrangements including floodplain management to achieve safer floodplains, and defences that enhance the riverfront environment. This might include resilient development and realignment of defences. Existing open space could be further enhanced to provide for tidal flood storage. The Bexley Local Flood Risk Management Strategy includes an assessment of local flood risk, objectives for managing flood risk and measures for achieving those objectives.

7.52 To support the preparation of the Local Plan, a strategic flood risk assessment (SFRA) for Bexley was undertaken in two distinct parts to reflect the two levels of SFRA presented by national guidance. The purpose of the Level 1 SFRA is to provide an evidence base to support spatial planning decisions, and it contains an assessment of the risks of all types of flooding at a borough-wide scale as well as a series of recommendations to deal with a range of flood sources, whilst the Level 2 SFRA supports the assessment of individual sites.

DP32 Flood risk management

Planning for flood risk

1. In areas at risk of flooding, as identified in the Bexley Strategic Flood Risk Assessment (SFRA), development proposals, including redevelopment (except minor development), must:
   a) be within a sustainable development location if the site is within Flood Zones 2 and 3a, and the development type is acceptable within the Flood Zone, as only these locations have passed the Local Plan sequential test
   b) apply the exception test, where required, to sites within flood zones 2 and 3a that have met the requirements of part 1a;
   c) comply with the guidance and recommendations set out in the Bexley SFRA Level 1 and 2;
   d) apply the sequential approach advocated in the NPPF to all sources of flooding, not just tidal and fluvial;
   e) be used as an opportunity to reduce the causes and impact of flooding;
   f) make as much use as possible of natural flood management techniques as part of an integrated approach to flood risk management); and,
   g) provide floodplain storage capacity as close to the development as possible, where the proposed development will reduce this capacity.

Tidal and fluvial flooding

2. Habitable rooms in residential development within the fluvial flood zones, should be set 300mm above the predicted 1 in 100 year plus climate change peak flood water level.

3. Development in areas designated as functional floodplain (as identified in the SFRA Level 1 and the submission policies map) will not be permitted outside of water-compatible development, as defined in the NPPF.

4. All proposals for development in flood zones 2 and 3, and all proposals on sites of 0.25 hectares or larger regardless of what flood zone the site is in, must include a site-specific flood risk assessment (FRA), including a drainage impact assessment.

5. New developments in riverside locations are required to help reduce flood risk now and into the future. Development proposals located within 100 metres of the Thames tidal flood defences should demonstrate consideration of and act on the recommendations of the TE2100 Plan; and be designed in such a way as to easily facilitate the raising and re-engineering of the tidal flood defences.

6. Basements will not be permitted in Flood Zones 2 or 3

Surface water, groundwater and sewer flooding

7. Development must not increase flood risk on-site or off-site, and exceedance flows must be considered and appropriately managed.

8. All basement developments should include, within their proposal, protection to the property by installing, for example, a non-return valve or other suitable device to avoid the risk of backflow at a later date, on the assumption that the sewerage network may surcharge to ground level during storm conditions

Safe refuge, access and egress in, to and from development

9. New developments below the predicted flood water level should include a detailed evacuation plan that clearly outlines how people can easily leave to safety or move upwards from the lower floors to safety.

DP32 Flood risk management

10. Site design in floodplains must facilitate safe escape, access and egress. Only in exceptional circumstances where this cannot be demonstrated should the emergency plan be to reside in situ and escape upwards in a building.

11. All development that is intended to be occupied below the predicted flood water level must provide internal safe refuge above the design flood level

Policy implementation

7.53 Government's flood risk vulnerability classifications and compatibility tables are the starting point for understanding whether a development proposal is appropriate for a specific location.

7.54 The Bexley SFRA supports the proposed development in the Local Plan. The SFRA Level 1 provides an evidence base to support spatial planning decisions at a borough-wide scale, including application of the sequential test, which has informed the sustainable development locations. These locations are identified in policy SP1 and illustrated on Figure 1 (the key diagram) and the submission policies map.

7.55 It also facilitates the application of the exception test for sites located in areas that have passed the sequential test (e.g. within flood zone 1 or sustainable development locations in flood zones 2 and 3a). The SFRA Level 2 applies a sequential approach within the sustainable development locations, and at the site-specific level for sites identified through the site allocations process. It also provides information for windfall sites to establish whether they can be made safe without increasing flood risk elsewhere.

7.56 Site-specific FRAs should be supported by evidence set out in Bexley's SFRA (levels 1 and 2). The Bexley SFRA Level 1 Chapter 6 provides guidance on managing the risk through site layout and building design. Flood risk management by design should only be considered after the sequential approach has been applied to development proposals. The sequential approach is applicable both in terms of site allocation and site layout. Site layout should seek to avoid flood risk.

7.57 The sequential approach to land use planning on sites can mitigate some of the flood risks, however, there will be instances where a level of risk remains. In these circumstances, flood risk management through design is required. This would need to be addressed as part of site-specific FRA.

7.58 The Bexley SFRA Level 1 Chapter 8 provides clear instruction to developers and Council officers as to when a site-specific flood risk assessment is required to accompany a planning application; and having determined that it is required, the minimum requirements for a site-specific flood risk assessment.

7.59 Applicants proposing development within 100m of flood defences should consult with the Environment Agency. New development provides an opportunity to improve the riverside both when defences are raised and when they are repaired or replaced. The Environment Agency has developed guidance and can provide examples for improving the riverside. Significant public access and public amenity improvements, landscape improvements and environmental enhancements can be achieved at modest cost if they are included as part of an integrated riverside design that includes flood defences.

7.60 Corridors of land along the existing defence lines should be safeguarded. This should include space for vehicle access for maintenance and repair of the defences. The width of land that should be

safeguarded for future flood risk management interventions on the River Thames should be at least sixteen metres. More space may be required especially if wider enhancements are to be achieved, and the Environment Agency should be contacted to discuss specific sites.

7.61 New developments in riverside locations are required help reduce flood risk now and into the future and to act on the recommendations of the TE2100 Plan. This could include for example; raising existing flood defences, providing improved access to existing flood defences, safeguarding land for future flood defence raising and maintaining, enhancing or replacing flood defences to provide adequate protection for the lifetime of development.

7.62 Where possible and viable, opportunities appropriate in scale should be taken to re-align or set back flood defence walls and improve the river frontage to provide amenity space, habitat, access and environmental enhancements. Financial contributions should be secured towards the anticipated costs of flood risk management infrastructure required to protect the proposed development over its lifetime.

➲ DP33: Sustainable drainage systems

Related plans, strategies and key evidence – why we need this policy

Strategic Flood Risk Assessment Levels 1 and 2
Local Flood Risk Management Strategy
Sustainable Drainage Design and Evaluation Guide

7.63 The NPPF states that local planning authorities should adopt proactive strategies to mitigate and adapt to climate change taking full account of flood risk, including from surface water and groundwater. Surface water drainage occurs when rainwater falls on a property and drains away; however, in some cases this can lead to flooding issues and onsite drainage management can help to reduce flood risk.

7.64 The London Plan states boroughs should utilise surface water management plans to identify areas where there are particular surface water management issues and develop actions and policy approaches aimed at reducing these risks.

DP33 Sustainable drainage systems

1. All development proposals, whether increasing or decreasing the impermeable area of the site, will be required to manage surface water through sustainable drainage systems (SuDS) in line with all national, regional and local policies and related guidance, in order to minimise flood risk, improve water quality and enhance biodiversity and amenity.

2. In addition, all development proposals will be required to demonstrate that:

   a) the drainage for the site achieves greenfield runoff rates for flood events up to and including 1 in 100 years plus 40% climate change;
   b) surface water run-off has been reduced by sustainably managing run-off on site;
   c) permeable paving has been used for hardstanding areas (e.g. car parks);
   d) the nature of water flow (both surface water and groundwater) across a steeply sloping site has been considered in order to provide suitable SuDS; and,
   e) water reuse mechanisms have been included for either indoor or outdoor purposes.

3. Development proposals on sites of 0.25 hectares or greater require a drainage strategy, which must be accompanied by a suitable maintenance management plan.

Policy implementation

7.65 SuDs for new major developments have been a national planning requirement since 2015 and are prioritised in the London Plan. Policy DP33 makes this a requirement for all development schemes. All development proposals should incorporate sustainable drainage systems in accordance with the guidance set out below.

7.66 Applicants are strongly encouraged to consider the requirements for SuDS at the earliest stages of design as this will enable their more effective integration and provision. Sustainable drainage systems should also be considered alongside the 'living building' requirements as they can provide biodiversity and urban greening benefits as well as practical drainage management.

7.67 SuDS features deliver important urban wildlife habitats and plants that encourage invertebrates, birds, bees and other pollinators. Incorporating green features to promote biodiversity will also improve rainwater management. SuDS can help combat the decline in biodiversity by contributing to the delivery of biodiversity net gain in new build or refurbishments.

7.68 Areas of the borough that are vulnerable to surface water flooding have different issues that can be addressed through new development and need to be resolved by development proposals. These areas are mapped in Bexley's Local Flood Risk Management Strategy. For most of these areas there are no flood defences in place and opportunities will need to be taken to accommodate sustainable urban drainage measures.

7.69 The Mayor's Sustainable Design and Construction Guide sets detailed standards with regards to use of sustainable drainage measures and the principles of flood resistant design. Bexley's Strategic Flood Risk Assessment includes guidance on sustainable surface water management.

7.70 The Flood Estimation Handbook (FEH) is the industry standard method for assessing flood flows in watercourses in the UK. Applications should follow the revitalised FEH statistical method to estimate greenfield runoff rates. Greenfield runoff is usually calculated as the peak rate of runoff for a specific return period due to rainfall falling on a given area of vegetated land.

7.71 For smaller, single dwelling sites, the IH124 method is considered an acceptable approach for assessing greenfield runoff rates. This method was specifically produced by the Institute of Hydrology to address the runoff from small catchments.

7.72 Large increases in impermeable areas for a site could contribute to a significant increase in surface water runoff, peak flows and volumes. In turn this could contribute to an increase in flood risk elsewhere. Examples for minimising surface water flooding in all development include maximising the use of soft landscaping, permeable surfacing materials, living roofs and walls and on-site rainwater storage.

7.73 For hardstanding areas (e.g. car parks) permeable paving is recommended, as it is considered to be a viable and environmentally friendly option that helps to reduce run-off. Pumping in all cases is discouraged without robust evidence that there is no alternative.

7.74 All SuDS must protect and enhance water quality by reducing the risk of diffuse pollution by means of treating at source and including multiple treatment trains where feasible. Schemes should be designed in accordance with Bexley's Sustainable Drainage Design and Evaluation Guide and relevant national standards, and there must be long term operation maintenance arrangements in place for the lifetime of the development. The Mayor has also produced surface water guidance, including a proforma for referable planning applications.

Annex A - Indicators for monitoring local plan strategic and non-strategic policies

Planning delivers the Council's spatial objectives for its place through planning policy and the development management process. The monitoring of local planning policies is essential to demonstrate their effectiveness and identify any potential need for a review of all or part of the local plan.

The Council produces a local plan monitoring report on an annual basis to measure this, for which the indicators set out in the tables below will be used as the basis for assessment. During a review of all or part of the local plan, indicators may be amended reflecting updated policy content.

Growth

Policy	Indicator	Source
SP1	Advertised departures from Bexley's development plan	Development Management report

Homes

Policy	Indicator	Source
SP2, DP3	Net additional dwellings, conventional and non-conventional	Planning London Data Hub
SP2, DP1	Affordable units constructed by type	Planning London Data Hub
DP1	Percentage of affordable housing from qualifying residential development (10 or more homes)	Planning London Data Hub
DP1	Average house prices	Land Registry
SP2, DP1	Number of people on the housing register	Housing team
SP2	Dwelling size (gross approvals and completions)	Planning London Data Hub
SP2, DP1	Number of individuals and groups on the Self-Build and Custom Housebuilding Register	Self-Build and Custom Housebuilding Register
SP2	Density of dwellings (approvals)	Planning London Data Hub
SP2, DP2	Delivery of housing on small sites	Planning London Data Hub
SP2, DP4	Number of gypsy and traveller pitches and sites	Uniform Access reports
DP1, SP7	Number and type of planning obligations secured	Community Infrastructure Levy/Section 106 Officer
DP5	Securing appropriate standards for houses in multiple occupation (HMOs)	Uniform Access reports
DP5, DP6	Net loss of housing from developments, including HMOs of a reasonable standard	Planning London Data Hub

Economy

Policy	Indicator	Source
DP7	Industrial uses – approvals and completions (net)	Planning London Data Hub
DP7	Industrial floor space pipeline for reporting year	Planning London Data Hub
SP3	Area of land allocated for industrial use taken up for development	Planning London Data Hub
SP3	Managed release of industrial land to other uses	Planning London Data Hub/Industrial land baseline report
SP4	Major retail approvals fulfilling the sequential 'town centre first' approach	Planning London Data Hub
DP9	Vacancy rate of shops in major district, district and local shopping centres	Shopfront surveys
DP10	Vacancy rate of shops in neighbourhood and small parades	Shopfront surveys
SP4	No net loss of culture venues and facilities	Planning London Data Hub
SP4	Percentage of E class uses within town centre boundaries	Planning London Data Hub/Shopfront surveys

Character

Policy	Indicator	Source
SP6, DP13	Approvals that would result in the loss of listed buildings	Development Management report/ Conservation Officer
SP6, DP13	Approvals that would result in the loss of locally listed buildings	Development Management report/ Conservation Officer
SP6, DP13, DP14	Approvals that would result in the loss of listed or locally listed buildings within conservation areas	Development Management report/ Conservation Officer
DP12	Approvals for developments with tall buildings	Planning London Data Hub

Infrastructure and environment

Policy	Indicator	Source
SP8	New dwellings on previously developed land	Planning London Data Hub
SP8	Inappropriate development on Green Belt/MOL	Development Management report/Planning London Data Hub
DP17, DP20, SP8	Area of publicly accessible open space lost and gained.	Planning London Data Hub
DP17, DP20, SP8	Area of designated publicly accessible open space lost.	Planning London Data Hub

Policy	Indicator	Source
DP17, DP20, SP8	Percentage of approved developments within 400m of Local Open Space (site size 2-20ha)	Planning London Data Hub
DP17, DP20, SP8	Percentage of approved developments within 280m of small local spaces (site size <2ha)	Planning London Data Hub
DP28	Percentage or number of main rivers of good or fair chemical and biological quality	Environment Agency Catchment Data Explorer
DP29	Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds.	Planning London Data Hub/ Development Management report
SP8, DP17, DP20	Net change in area of biodiversity importance and/or protected by nature conservation designations	Planning London Data Hub/Biodiversity Officer
SP10	improvements to air quality at monitoring stations	Environmental Health Officers
SP10	percentage of approved applications demonstrating that they meet at least air quality neutral standard for emissions (based on a rolling average)	Planning London Data Hub
SP10	Amount of carbon off-set funding for the reporting year	CIL/S106 Officer
DP15	Percentage of approved dwellings within 800m of public transport	Planning London Data Hub /Transport Development team
DP15	Number of development schemes (commercial and major residential) approved exceeding maximum parking standards	Planning London Data Hub/Transport Development team
SP8, DP32	Number of car free developments in the borough	Planning London Data Hub /Transport Development team
SP7	Approvals for new community floorspace (F.1 & F.2)	Planning London Data Hub
DP8	Approvals for any new or upgraded telecommunications and associated equipment	Uniform Access reports team
DP26	Capacity of new waste management facilities by waste planning authority (tonnes/m^3/litres)	Environmental Services team
SP11	Amount of municipal waste arising and managed (by type), by waste planning authority (tonnes)	Environmental Services team
DP26	Production of primary land-won aggregates (tonnes)	Environmental Services team

Annex B - Glossary of planning terms

This glossary provides guidance on the meaning of terms that are specific to the Bexley Local Plan. Refer to the National Planning Policy Framework and the London Plan for terms not defined here.

Active frontages add interest, life and vitality to the street and public realm. Buildings should have active frontages that have:

- frequent doors and windows without blank walls
- articulated facades with bays and porches
- lively internal uses visible from the outside, or spilling onto the street
- concentrations of activity at particular points.

Alteration Work intended to change the function or appearance of a place.

Amenity A positive element or elements that contribute to the overall character or enjoyment of an area. For example, open land, trees, historic buildings and the inter- relationship between them, or less tangible factors such as tranquility.

Amenity Space is a garden or balcony that is used for the day-to day activities of a household, such as clothes drying, relaxation, play and gardening. Communal amenity spaces may be provided for blocks of flats or within residential areas.

Ancient Woodland has been continually wooded since 1600 and is generally considered to have never been cleared since prehistoric times.

Archaeological Priority Areas are areas where there is potential for significant archaeological remains. Planning applications within these areas must be accompanied by an archaeological assessment and evaluation of the site, including an assessment of the potential impact of the proposed development on the significance of archaeological remains.

Archaeology specifically the remains below the ground, provides evidence of the evolution of development and settlements in this area. All remains are unique and represent a finite and non-renewable resource.

Archaeological interest there will be archaeological interest in a heritage asset if it holds, or potentially may hold, evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places and of the people and cultures that made them (NPPF definition). There can be an archaeological interest in buildings and landscapes as well as earthworks and buried remains.

Asset of Community Value is a building or other land which it main used currently or was recently used to further the social wellbeing or social interests of the local community. The Localism Act 2011, Chapter 3 states that 'social interests' include cultural, recreational and sporting interests.

Authority Monitoring Report (AMR) is a report produced by the Council to monitor the performance of planning policies using a range of different indicators, including housing delivery.

Building Research Establishment Assessment Method (BREEAM) measures the environmental performance of commercial buildings by assessing water, waste, energy and travel usage.

Built Heritage means all the heritage places and features that survive as buildings or structures, above or below ground, whether visible or not, and whether visitable or not.

Carbon footprint is the amount of carbon emitted by an individual or organisation in a given period, or the

amount of carbon emitted during the manufacture of a product

Circular economy is where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. The end goal is to retain the value of materials and resources indefinitely, with no residual waste at all. This is possible, requiring transformational change in the way that buildings are designed, built, operated and deconstructed.

Climate change is a pattern of change affecting global or regional climate, as measured by average temperature and rainfall, and how often extreme weather events like heatwaves or heavy rains happen. This variation may be caused by both natural processes and by humans. Global warming is an informal term used to describe climate change caused by humans

Climate change adaptation is adjustments to natural or human systems in response to actual or expected climatic factors or their effects, including from changes in rainfall and rising temperatures, which moderate harm or exploit beneficial opportunities.

Climate change mitigation is action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.

Community facilities are defined by the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments. Community facilities include:

- Leisure and culture facilities (including arts, entertainment and sport facilities)
- Community centres and meeting places (including places of worship)
- Libraries
- Facilities for children (from nursery provision to youth clubs)
- Education (including adult education)
- Healthcare facilities

Conservation is the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance (NPPF definition).

Conservation Areas are areas of special architectural or historic interest whose character or appearance is protected. They have to be formally designated under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990.

Context refers to the setting of a site or area, including factors such as townscape, built form, land use, activities, heritage and vehicular and pedestrian movement.

Core strategy is the most important spatial planning document the Council has produced over a decade. It sets out how we propose the borough develops over the next 15 years to meet the challenges of changing environment, population and economy.

Density is the amount of internal floor space of a building in relation to an area of land. Density can be expressed in terms of plot ratio (floor to area ratio (FAR)) for commercial and mixed-use development and number of units or habitable rooms per hectare for residential development.

Designation is the recognition of particular heritage value(s) of a significant place by giving it formal status under law or policy intended to sustain those values

Designated Heritage Asset is a term used in the NPPF to refer to heritage places that have been selected under a range of relevant legislation or criteria for formal recognition of their heritage value and significance.

Dwelling may be a house, bungalow, flat, maisonette or converted farm building.

Emissions are any release of gases such as carbon dioxide which cause global warming, a major cause of climate change

Flatted development refers to homes which have neighbouring homes above and/or below. Maisonettes and duplexes are flatted development.

Flood Risk Zones are areas at risk of flooding. Flood Risk Zones are categorized as Zone 1 (low probability), Zone 2 (medium probability), Zone 3a (high probability) and Zone 3b (the functional floodplain).

Global warming is the steady rise in global average temperature in recent decades, which experts believe is largely caused by human-produced greenhouse gas emissions

Green and brown roofs are roofs with vegetation cover and/or landscaping over a drainage layer. They are designed to provide insulation, increase biodiversity and retain rainwater and reduce the volume of surface water runoff.

Green infrastructure is a network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic and health wellbeing benefits for nature, climate and local and wider communities and prosperity.

Green wildlife corridor is a network of green and blue spaces that allows some species with specialised habitat requirements to extend their distribution into parts of London where they would otherwise not be present. The rivers, canals road and rail-side land are important components of these corridors and are a great benefit to London's biodiversity.

Gross External Area (GEA) is the whole area of a building taking each floor into account.

Gross Internal Area (GIA) is the enclosed area of a building within the external walls taking each floor into account and excluding the thickness of the external walls.

Harm in planning terms means something that may damage a heritage asset or result in a loss of significance. This should not be permitted.

Heritage (asset) goes beyond physical form to involve all of the individual characteristics that can contribute to giving somewhere a distinctive 'sense of place.' Certain places hold special meanings for people and a strong 'sense of place' that can be deeply felt by local inhabitants and appreciated by visitors. It reflects the knowledge, beliefs and traditions of diverse communities and provides a sense of inclusivity, continuity and a source of identity. It is a social and economic asset and a resource for learning and enjoyment. Understanding the historic character of a place is an essential starting point for deciding its future.

Heritage (natural) includes inherited habitats, species, ecosystems, geology and landforms, including those in and under water, to which people attach value.

Hierarchy of town centres is a ranking of town centres based on size and importance. The types of town centre in Bexley are Major Centres, District Centres, and Local Centres (all defined in the London Plan) and local designations of Neighbourhood Centre and Small Parades.

Historic Environment is a very general term used to refer to everywhere around us that has something significant about it. It is defined by the NPPF as: 'all aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged and landscaped and planted of managed flora.'

Historic Environment Record (HER/GLHER) is a public, map-based data set, primarily intended to inform the management of the historic environment. This includes information services that seek to provide access to comprehensive and dynamic resources relating to the historic environment of a defined geographic area for public benefit and use. Historic England maintains the Historic Environment Record for Greater London.

Historical interest (buildings) refers to buildings that have important aspects of the nation's social, economic, cultural or military history, such as industrial buildings, railway stations, schools, hospitals, theatres, and town halls.

House is a self-contained residential dwelling. Houses can be detached, semi-detached or terraced. Bungalows are houses.

Infrastructure includes educational infrastructure (such as early years facilities, schools, facilities for children and young people), social infrastructure (such as community buildings, faith premises, leisure facilities, cultural facilities), health infrastructure (such as health and emergency services), utilities (power, gas, water, sewerage and telecommunications (digital)), transport infrastructure (such as roads, railways, bridges, cycle routes, walking routes, tunnels) and environmental infrastructure such as (green links (open spaces), Sustainable Urban Drainage Systems (SUDs), Waste Management facilities and consolidation centres).

Integrated Impact Assessment is a method of estimating the potential environmental, social or economic implications of planning policies. Planning documents must be assessed to identify the extent to which they may have any unfair impacts on groups in the community, such as people of different gender, ethnic group, age, religion, belief, sexual orientation, or disability.

Landscape refers to the character and appearance of land, including its shape, topography, form, ecology and natural features.

Layout refers to the way buildings, routes and open spaces are placed in relation to each other.

Listed Building is a building or structure which is considered to be of 'special architectural or historic interest. This includes a wide variety of structures and buildings. There are three grades of listing depending on the importance of the building.

Live/Work Units are units of living accommodation, which are specifically designed to accommodate work facilities for those residing therein.

Local Centres are the smallest town centres in the Town Centre Hierarchy. Local Centres have good access and include a small group of shops and services serving the needs of the local community. They typically have shops like newsagents, off- licenses, general grocery stores and post office and occasionally a pharmacy, a hairdresser and other small shops of a local nature.

Local Development Scheme (LDS) sets out the council's timetable for preparing planning documents over a three-year period and the purpose and scope of each document.

Locally Listed Building is a building, structure or feature which is not statutorily listed but is important in the local context owing to its special architectural or historic interest or its townscape or group value. The protection of local heritage is important because it enhances the value of Bexley's built environment, but also maintains a sense of local distinctiveness which can assist with regeneration and place-making.

London Plan is the Mayor's spatial development strategy for London. It forms part of Bexley's Development Plan alongside the Local Plan.

Maintenance includes routine work necessary to keep the fabric of a place in good order

Material (assessment) is relevant to and having a substantial effect on a decision, therefore demanding consideration.

Major development means development involving any one or more of the following:

a) the winning and working of minerals or the use of land for mineral-working deposits;
b) waste development;
c) the provision of dwelling houses where:

    i. the number of dwelling houses to be provided is 10 or more; or
    ii. the development is to be carried out on a site having an area of 0.25 hectares or more and it is not known whether the development falls within sub-paragraph (c)(i);

d) the provision of a building or buildings where the floor space to be created by the development is 1,000m^2 or more; or
e) development carried out on a site having an area of one hectare or more.

Massing refers to the combined effect of the height, bulk and silhouette of a building or group of buildings.

Metropolitan Open Land is a designation equivalent to the Green Belt. The designation is intended to protect areas of landscape, recreation, nature conservation and scientific interest which are strategically important.

Mitigation is a measure introduced to avoid or reduce an effect.

Non-designated Heritage Asset places which do not have formal recognition but may nevertheless be demonstrably equivalent in value to formally recognised assets, and in some cases should be treated in the same way. The value of places can change over time and heritage value and significance may become apparent when new evidence or knowledge is revealed.

Preserve is to keep safe from harm

Protected species are a species of animal or plant which it is forbidden by law to harm or destroy.

Private (or market) housing is available to either buy or rent privately on the open market.

Public realm is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.

Public transport includes busses, trains and river boats that operate on fixed routes for fixed fares

Publicly accessible is accessible from the public realm, including streets, squares, forecourts, parks and open spaces.

Registered Providers (RPs) are housing providers that are registered with the Homes and Communities Agency. Most RPs are housing associations, but some RPs are trusts, co-operatives and companies.

Renewable energy is energy that is collected from renewable resources, which are naturally replenished on a human timescale, such as sunlight, wind, rain, tides, waves, and geothermal heat. Renewable energy often provides energy in four important areas: electricity generation, air and water heating/cooling, transportation, and rural (off-grid) energy services.

Restoration is to return a place to a known earlier state, on the basis of compelling evidence, without conjecture

Scale refers to the relationship of the relative size of a building or structure to another.

Scheduled Ancient Monument (SAM) is a legally protected (generally archaeological) site that is considered to be of national importance. Scheduled monuments are described here because of the high level of legal protection that is afforded them.

Scheduled Monument is protected by law, and any development that affects a scheduled monument requires formal written Scheduled Monument Consent (SMC) from the Secretary of State for DCMS. Historic England's Inspector of Ancient Monuments gives advice to the government on each application and administers the consent system. In assessing applications, the Secretary of State will aim to ensure that the significance of protected sites is safeguarded for the long term.

Setting of a heritage asset is the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Sensitivity is the likelihood of typical development impacts causing significant harm to assets of National, Regional and Local Interest. Sensitivity is closely allied to significance and potential but also takes account of an asset's vulnerability and fragility.

Significance is the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.

Sites of Importance for Nature Conservation (SINCS) provide valuable wildlife habitat and opportunities for experiencing nature. These are important in helping local plant and animal specifies to survive. Sites are classified according to whether they have London- wide, borough-wide and local importance.

Statement of Community Involvement sets out how the council will consult people on the preparation of planning documents and on planning applications.

Strategic Flood Risk Assessments (SFRA) assess risks from flooding, including from the River Thames, surface water runoff and drainage overflow.

Supplementary Planning Documents (SPDs) explain how current planning policies in the Local Plan will be applied. They also contain background information applicants may find useful when preparing their planning applications.

Sustainable development is a state of being capable of meeting present needs without compromising ability to meet future needs.

Sustainable drainage system is an environmentally friendly way of dealing with surface water runoff to avoid problems associated with conventional drainage practice. These problems include exacerbating flooding. This approach may also be termed "SuDS" (or sustainable urban drainage systems)

Temporary uses refer to a range of temporary uses of vacant buildings of land for social or economic gain until they can be brought back into commercial use.

Tall Buildings are 25 meters and taller (approximately eight storeys), measured from the ground to the top of any equipment on the roof.

Tenure blind architecture is design of a housing estate so that houses for sale (whether at 'market' prices or through a shared ownership agreement) and houses built to be rented (from the local authority, from a

housing association or from a registered social landlord) are purposefully made similar in design to mask the tenures. The conviction is that tenure blind design helps social integration without affecting property prices. Whether tenure masking is applied or not, properties will vary in size and sort. They may be 'buffered' to appear as a graduated range of different house types within the same street.

Transparency means something is open to public scrutiny.

Town centre uses are defined in the Glossary of the NPPF. Main town centre uses include retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). For the purposes of policies in this Local Plan, F1(d) public libraries and F2(b) local community halls are considered main town centre uses. Within town centres, residential units, which are also a town centre use, should be located above ground level where possible to allow for more 'active' town centre uses at ground level. It would be appropriate for access doorways and entrances to be located at ground floor level for accommodation above.

Urban design involves the design of buildings, spaces and landscapes at a variety of scales. It can involve the establishment of frameworks and processes which facilitate successful development.

Urban Open Space (UOS) refers to a land use designation that is similar in spirit to Metropolitan Open Land (MOL) or Green Belt. Urban open space is important to the health and wellbeing through its contribution to the landscape and in providing attractive breaks in the built-up area. Larger open spaces are important because they accommodate a wide range of open-air recreational, leisure, educational, institutional and other uses within easy reach of residential areas. Even small open spaces that are enclosed by buildings along several edges can provide a respite from the urban form of the borough. Once open land is built on it is lost forever.

Value includes an aspect of worth or importance, attached by people to the quality of places.

Waste management facilities are facilities where waste is processed including sorting, composting, recycling, and biological treatment, and recovery of energy from incineration.

PART 2: RESIDENTIAL AND RESIDENTIAL-LED MIXED-USE SITE ALLOCATIONS

Introduction

Bexley is experiencing significant change and population growth – the London Plan identifies housing need across the whole of London and sets 10-year targets for net housing completions for each London borough. For Bexley, the 10-year target is for 6,850 (net) additional homes in the borough. Bexley is an attractive and sustainable place for growth; however, there is only a limited amount of land available. Therefore, where development does takes place it is important to ensure that the most efficient use of land and buildings is achieved, and that the development responds to local needs and aspirations.

Plan-making authorities carry out land availability assessments for development in order that sites may be identified for the use(s) which is most appropriate. The assessment is an important source of evidence that provides information on a range of sites that have the development potential to meet the plan-making authority's requirements although it does not in itself determine whether a site should be allocated for development. It is for the Local Plan itself to determine which of those sites are the most suitable to meet those requirements based not just on the site assessments but on other evidence. Further detail on this process is set out in the Site Allocations Technical Paper and Regulation 18 Consultation Statement.

Part 2 of the Local Plan sets out the Council's site allocations for residential and residential-led mixed-use development. It builds on the policies in Part 1 of the Local Plan and on the Mayor's London Plan, following the spatial strategy set out in Policy SP1 and the Key Diagram (Figure 1) ensuring that development areas are planned for in a way that respects the local character of the surrounding area and meets the needs of local communities and businesses. It demonstrates the large sites component of the Local Plan Housing Trajectory (Annex C), working in tandem with the published 5-year housing land supply of housing land and small sites windfall allowance. It can also inform as well as make use of sites in brownfield registers.

The site allocations set out a level of detail to provide certainty to relevant stakeholders and demonstrate that Bexley's housing requirement can be met in a sustainable way. The sites have been tested through the integrated impacts assessment, the transport assessment and the flood risk assessment. Each site allocation includes a policy that is unique so that it can respond to local and site-specific issues and opportunities. Policies set out land uses, the minimum number of homes to be delivered, and other site-specific requirements that proposals must meet to be policy compliant. In addition to conforming to all other relevant policies in the Development Plan, development proposals should have regard supplementary planning guidance, in particular design guidance, and other strategies where relevant.

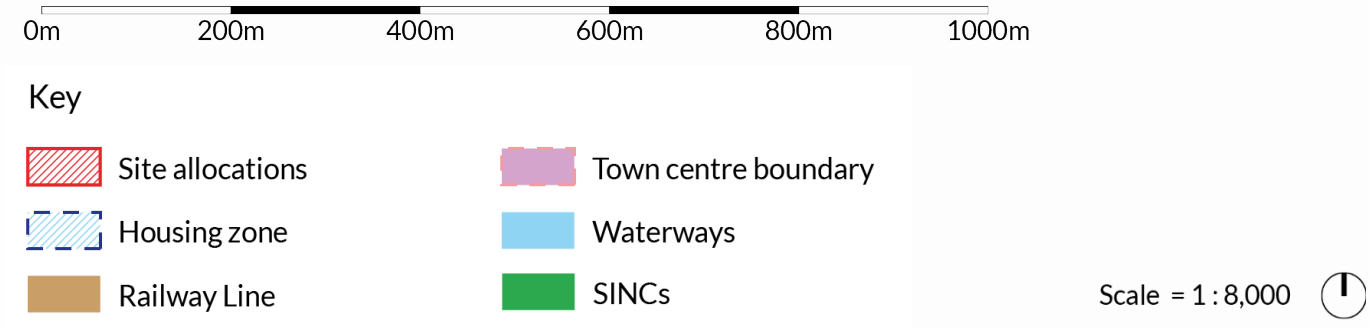
What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. **Module A** sets out an approach to assessing sites and provides a tool that uses the application of residential typologies to test and establish site capacity. The tool assumes that sites are cleared, unless specified otherwise, and therefore the residential capacity figures are gross.

Sites within town centres are constrained to 75% of the gross site area to allow for the inclusion of town centre uses. Sites that include other land use designations such as urban open space or sites of importance to nature conservation will also constrain the residential area of the site. Committed transport interventions can increase site densities. Development phasing is indicative and has been included to inform the housing trajectory. Development proposals can be put forward to the Council at any time for consideration although piecemeal development must be avoided. The site allocations are defined on the submission policies map.

Abbey Wood sustainable development location



Figure 14: Abbey Wood sustainable development location with identified site allocations



Site Allocation	Site name/ID
SA1	ABW01 Felixstowe Road Car Park
SA2	ABW02 Lesnes Estate/Coralline Walk

Table 12: List of site allocations in the Abbey Wood sustainable development location

ABW01 Felixstowe Road Car Park

Felixstowe Road, Abbey Wood

SA1 ABW01 Felixstowe Road Car Park

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development. The design-led approach for optimising site capacity suggests that a minimum of 90 new homes can be achieved on this site.

Development approach

2. Development of this site should transform the area. The site should act as a gateway to Abbey Wood town centre and the wider Housing Zone to the north. As well as meeting other policy requirements, proposals must provide high-quality public realm and an appropriate mix of uses to create a sense of arrival when leaving the station at both flyover and ground level. Reducing flood risk, particularly surface water flooding, must be a key consideration for development proposals on this site. A bike hub should be included within the public realm, and an element of public car parking should be integrated into the scheme.

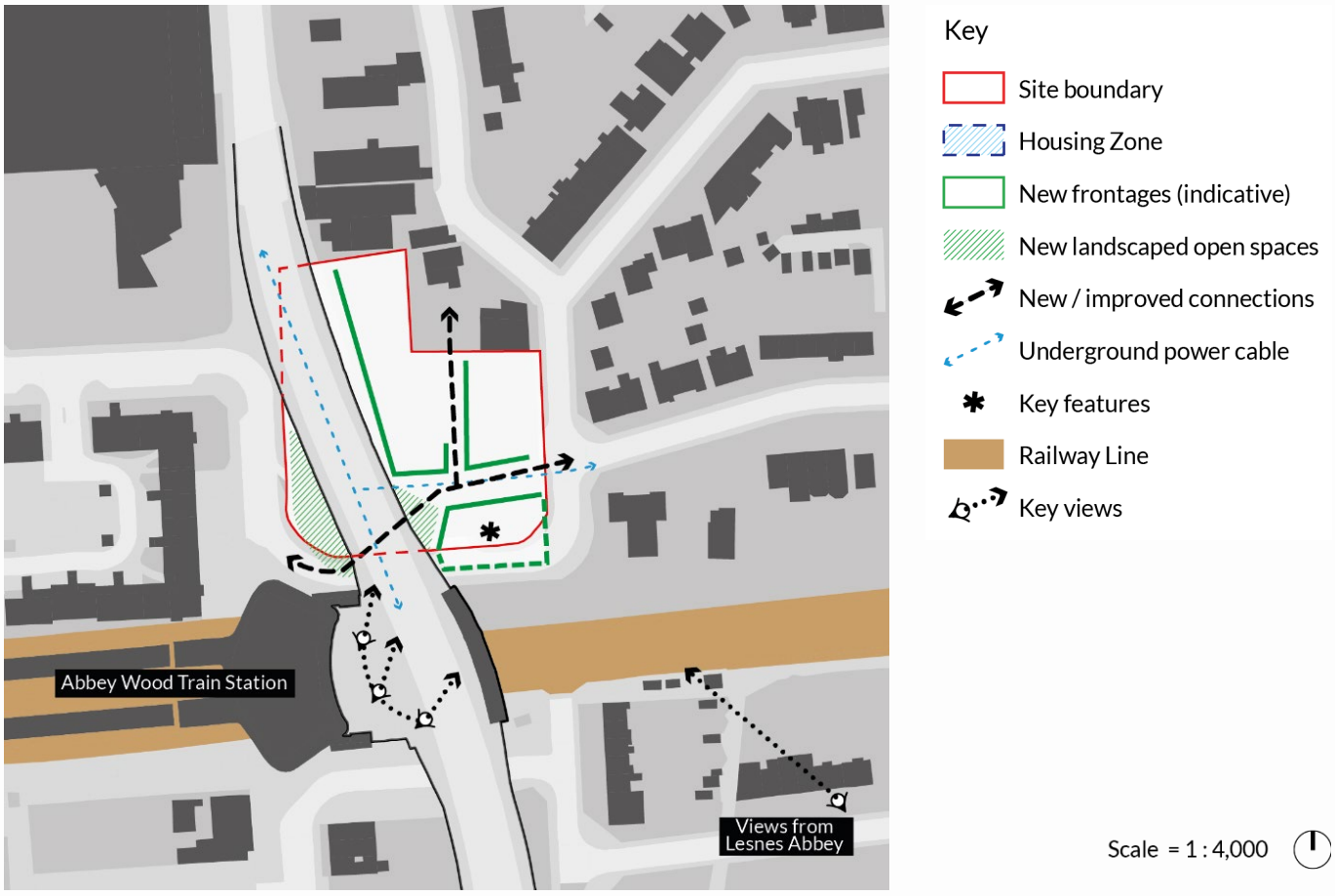


Figure 15: Felixstowe Road Car Park site summary information

Site and surroundings

Felixstowe Road car park is a medium sized brownfield site located within the local town centre of Abbey Wood Village. It is adjacent to Abbey Wood station which, once the Elizabeth Line begins operating, will act as an important transport hub and will become the best-connected station in the borough. It lies on the boundary with the Royal Borough of Greenwich.

The site has formerly been a car park and has most recently been used as a compound for the Crossrail works. It is dissected in the southwestern corner by the Harrow Manorway flyover, a busy elevated roadway which causes severance locally and under which the site provides the connection between the station and the established residential area to the east.

The site is part of the Abbey Wood and South Thamesmead Housing Zone, which is the focus of registered housing provider Peabody's efforts to regenerate the oldest parts of the 1960s/70s Thamesmead estate, including the provision of new high-density mixed-use and residential development and extensive public realm improvements. In this context, the site was included within a larger outline planning consent that highlights the importance of integrating the site with the broader opportunity to its north.

Opportunities and constraints

Opportunities	Constraints
Providing high-quality public realm around Abbey Wood station that incorporates a 'bike-hub' and forms part of a legible sequence of public spaces leading pedestrians and cyclists towards Southmere Lake and the wider Thamesmead area.	National Grid underground power cables cross the site, entering near Harrow Manorway and exiting down Rushdene Road. Maintenance access will need to be maintained. The culverted Great Breach Dyke also runs under the site, from which development must be offset.
Creating a mixed-use development with town centre uses at ground and flyover levels with residential accommodation above.	The Harrow Manorway flyover arches over the site, covering approximately a quarter of its area. This places a constraint on the developable area and raises potential issues around amenity, traffic noise, and air quality.
Using the development to create a sense of arrival when exiting Abbey Wood station and reinforcing the station's location within the local area as an important transport hub.	Development will be expected to provide an element of public car parking, with contributions sought towards the potential expansion of the Controlled Parking Zone around Abbey Wood station.
Intensifying an empty site adjacent to Abbey Wood station, which has one of the highest levels of access to public transport provision in the borough.	The site is within 425m of ancient woodland and development is likely to be highly visible from elevated position of the Lessness Abbey scheduled ancient monument.
Reducing flood risk by improving surface water runoff with possible scope to open up the Great Breach Dike culverted watercourse, to 'daylight' the river.	The site falls within flood zone 3a and a critical drainage area where surface water flooding is prevalent.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Streets and public spaces: Consider re-establishing the historic alignment of Railway Road (now known as Rushdene Road) across the site. Incorporate the area under the flyover into high-quality public realm that addresses Abbey Wood station and use this sheltered land for the provision of a bike hub. Consider the use of paving materials which would continue to provide a high-quality street scape in the eventuality that access is needed to the underground cable. An offset from any built structure to the Great Breach Dike watercourse culvert, which runs directly under the site should also be observed.

Blocks: Consider expanding the development site to include the carriageway of Felixstowe Road and other adjacent land to add flexibility to the site's developable area and establish the potential for creating a block adjacent to the railway.

Height and massing: Consider the design and arrangement of buildings to point the way towards Southmere Lake and the Thamesmead Housing Zone. Consider the use of a tall building up to 15 storeys to mark the presence of Abbey Wood station.

Uses: Town centre uses should be located at ground and at flyover level (which is the main entrance to the station), to create public realm with shops fronting the station entrances at both levels. Residential accommodation should be incorporated above. An element of public parking should also be incorporated into the scheme.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
0.545	0.408 (assumes residential above ground and flyover levels)	5	3a	Council ownership	Temporarily in use as the construction site office for Crossrail	Local town centre

Table 13: Felixstowe Road Car Park site summary information

Other guidance

Archaeology: The site falls within a Tier 3 Archaeological Priority Area. An Archaeological Assessment would need to accompany a planning application.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 report: site ID MS48. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: The northern half of the site is identified as being deficient in access to open space. Refer to the Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to the Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets including ancient woodland and SSSIs. The site is within 500m of Ancient Woodland and an SSSI. Also Refer to the Bexley SINC Report: Lesnes Abbey Woods and Bostall Woods SINC Ref.M015, and strategic green wildlife corridors 2 and 9. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: Road and rail noise affect parts of the site, as do high levels of NOx emissions from vehicles. Refer to the Local Plan Transport Assessment (Chapter 19 on air quality).

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

ABW02 Lesnes Estate/Coralline Walk

Wolvercote Road, Abbey Wood

SA2 ABW02 Lesnes Estate/Coralline Walk

Land use and capacity

1. This site is allocated for primarily residential development through estate regeneration, proposed by Peabody, the registered housing provider and landowner, to deliver 1,849 new homes, replacing 746 units of existing housing.

Development approach

3. Development of this site should transform the area. As well as meeting other policy requirements, proposals should introduce a simplified street layout and block pattern, improving permeability through the site. A key north-south route should be established, providing a link between the Housing Zone sites. High-quality public open space should be integrated throughout the proposed scheme with clear definition between public and private spaces. Flood risk must be mitigated effectively and sleeping accommodation should be avoided on ground floors. Proposals should be future-proofed to allow for later intensification and should not preclude public transport routes through the site.



Figure 16: Lesnes Estate/Coralline Walk site map and details

Site and surroundings

The Lesnes Estate and Coralline Walk together form a large, developed site (11.07 ha) located within 300m of Abbey Wood station and adjacent to the borough boundary with RB Greenwich.

The existing estate currently suffers from issues brought about by a lack of active frontages, confusing street layouts, over dominance of cars and poor public realm. However, the location has many benefits that include access to good community facilities and proximity to green and blue assets at Lesnes Abbey Wood, Abbey Way and Southmere Lake.

The site includes part of the Abbey Wood and South Thamesmead Housing Zone, which is the focus of registered housing provider Peabody's efforts to regenerate the oldest parts of the 1960s/70s Thamesmead estate, including the provision of new high-density mixed-use and residential development and extensive public realm improvements.

Opportunities and constraints

Opportunities	Constraints
Intensifying development on this site, whilst providing an improved environment for pedestrians, including the creation of a new large public open space.	Underground utilities along Wolvercote Road and associated 7 metre exclusion zone. Costs associated with relocating the services could be prohibitively expensive.
Improving movement through and within the site. Providing active and animated access routes to landscape, leisure amenities, community facilities, and transport nodes surrounding the site.	The sites northern boundary may conflict with Yarnton Way Bus Rapid Transport safeguarding area.
Removing the Yarnton Way wall, allowing improvements to frontage onto Yarnton Way to create the feel of a local street and improve the experience of walking and cycling.	The site falls within flood zone 3a and a critical drainage area where surface water flooding is prevalent.
Positively addressing the wider South Thamesmead housing area, including the prospect of redefining Lensbury Way as an active residential street with homes fronting onto the street and create an attractive route between the station and neighbouring housing estates.	Limited height of housing to the south of the site will restrict building heights in adjacent areas. Opening up the boundary wall to the north will open up the site to the effects of noise and traffic generation along Yarnton Way.
Enhancing ecological value and connections between the built environment and the Site of Importance for Nature Conservation and green wildlife corridor along Abbey Way.	Design will need to protect the SINC along Abbey Way.

Indicative design responses and development parameters

Streets and public spaces: Develop clear and legible street layouts, with fewer, but higher quality streets. Wayfinding could further be supported with careful placement of key buildings. Consider integrating landscaping into street design and improving accessibility for pedestrians and cyclists in both the north-south, and east-west direction. Consider the creation of a large green open space, which could act as a key node along a green route from the station to Southmere village. Future intensification of the site could be facilitated by providing parking in a way that would allow it to be later developed, subject to improvements in public transport accessibility.

Blocks: Consider the creation of perimeter blocks that have clear fronts and backs as well as clearly defined public and private spaces and carefully designed privacy zones. Explore the opportunity to create a varied scale across the site and consider creating two distinct character areas.

Height and massing: Consider a carefully distributed cluster of taller buildings to the west of the site, relating to the emerging context along Harrow Manor Way. Development will need to respond to lower heights of existing housing to the south. Building footprints should be maximised.

Uses: Any non-residential uses should be limited to Coralline and Southmere frontages and should not undermine the town centre or community facilities at Southmere public square.

Flood risk: Sleeping accommodation is to be avoided on the ground floor to comply with flood risk requirements. Sustainable drainage measures will need to feature heavily in the design; water retention features will need to be carefully designed to take into account the higher water table in this area.

Site area (hectares)	Residential site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
11.070	9.307 (excludes urban open space and SINC)	1b to 5	3a	Single ownership	Residential	Primarily residential area; urban open space; SINC

Table 14: Lesnes Estate/Coralline Walk site summary information

Other guidance

Archaeology: The site falls within a Tier 3 Archaeological Priority Area and within 650m of a scheduled ancient monument and statutorily listed building at Lesnes Abbey. An Archaeological Assessment would need to accompany any planning application.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS49. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: Parts of the site are deficient in access to one or two levels of the open space hierarchy. Refer to the Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to the Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets. The site is within 750m of Ancient Woodland and an SSSI. East of the site is a Grade II Borough SINC, refer to the Bexley SINC Report: Southmere Park & Yarnton Way/Veridion Way SINC Ref.BxBII02; Lesnes Abbey Woods and Bostall Woods SINC Ref.M015; and strategic green wildlife corridor 3. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: There are very high levels of NOx pollution along Harrow Manorway, which penetrates a short distance into the site. The rest of the site has much lower levels of air pollution, but mitigation measures should be implemented to improve air quality across the site. There is significant road noise emanating from Harrow Manorway to the west.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

Lower Belvedere sustainable development location



Figure 17: Lower Belvedere sustainable development location

Site Allocation	Site name/ID	Site Allocation	Site name/ID
SA3	BEL01 ASDA and B&Q Belvedere	SA7	BEL05 Belvedere Gas Holders
SA4	BEL02 Station Road East	SA8	BEL06 Monarch Works
SA5	BEL03 Station Road West	SA9	BEL07 Crabtree Manorway South
SA6	BEL04 Land adjacent Woodside School		

Table 15: List of site allocations in the Lower Belvedere sustainable development location

BEL01 ASDA and B&Q Belvedere

Lower Road, Belvedere

SA3 BEL01 ASDA and B&Q Belvedere

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development. The design-led approach for optimising site capacity suggests that a minimum of 457 new homes can be achieved on this site along with, as a minimum, the re-provision of the existing floor space for town centre uses.

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, proposals should provide legible routes between the station and the wider area, and the developer should contribute to a new pedestrian link across Lower Road to help unlock the site. Proposals should create a sense of arrival at Belvedere station. Landscaped buffers, including through improvements to the existing ditches and dikes, should be introduced at the northern and eastern edges of the site to limit impacts on the adjacent SINC and reduce the risk of flooding. Town centre parking should be provided at an appropriate amount and designed to minimise its functional and visual impact. Proposals should not preclude public transport routes through the site and should not result in harmful piecemeal development.

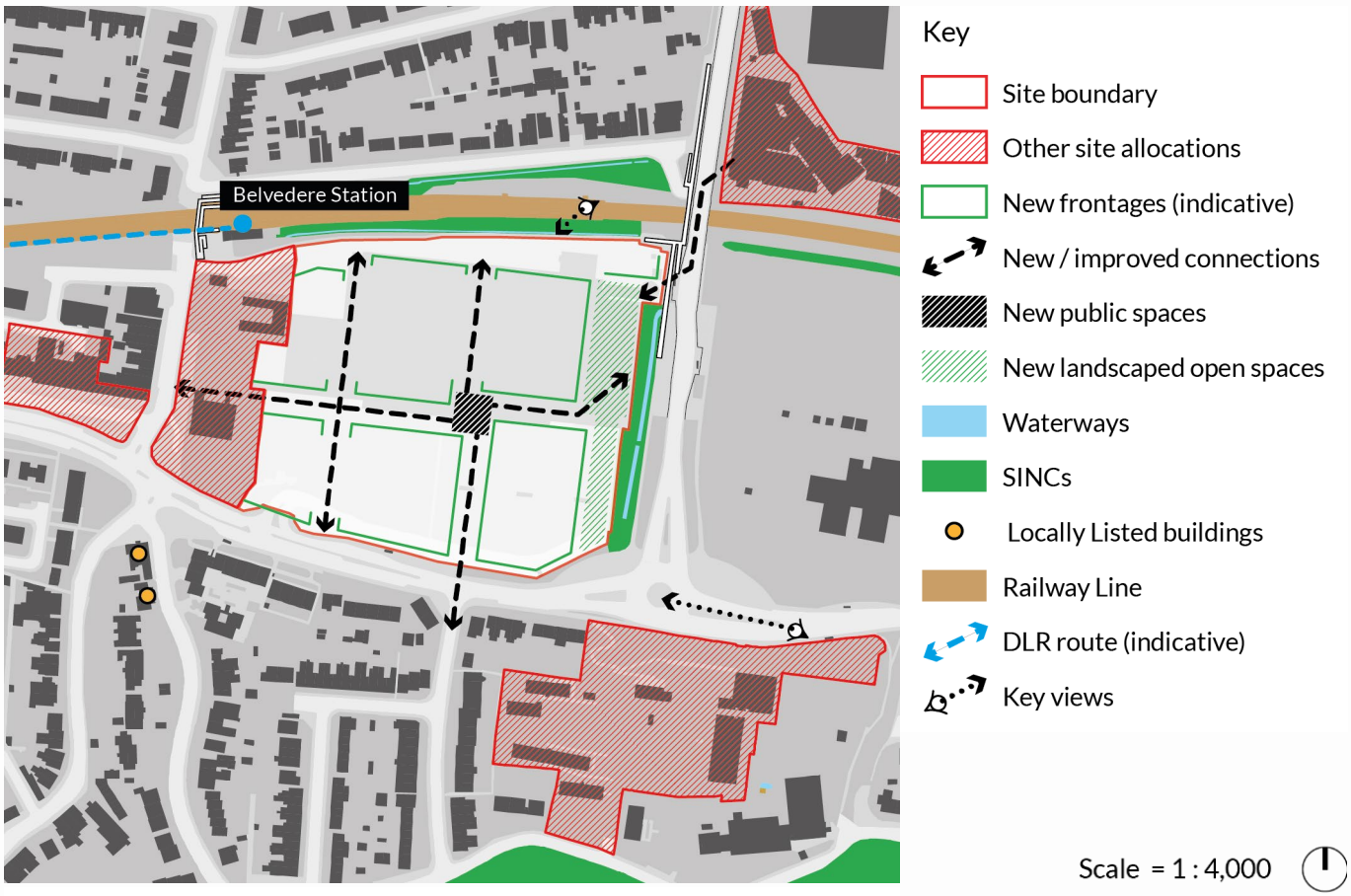


Figure 18: ASDA and B&Q Belvedere site map and details

Site and surroundings

This is a large brownfield site (3.31 ha) that forms a significant part of Lower Belvedere town centre. The site is adjacent to Belvedere station and is currently occupied by a large retail warehouse. Approximately 550 car parking spaces surround the store and isolate it from the street, creating a large car-dominated void along much of Lower Road. On the south side of Lower Road, a mix of apartment blocks and houses sit in an elevated and set back position opposite the site. Picardy Manorway flyover bounds the site to the east. Three bus routes (229, 401, 469) also stop directly outside the site boundary.

Opportunities and constraints

Opportunities	Constraints
Intensifying a sparsely developed site to create a residential-led mixed-use quarter within a town centre, with access to good provision of public transport and potential future transport interventions including a DLR terminus, extension of Crossrail, and a new station entrance.	The site remains in active use. Retail warehousing occupies the northern half of the site whilst the remaining southern half is laid out as surface parking. A phased approach could be necessary to ensure businesses can remain operational whilst the site is intensified and new floorspace created.
Creating a positive and distinctive sense of arrival at Belvedere station by working in partnership with neighbouring sites to improve local levels of permeability and better integrate Belvedere station into the wider area.	A buffer strip along the site's northern boundary should be provided to avoid precluding the delivery of Crossrail and DLR to Belvedere station in the future.
Increasing development potential by working in partnership with neighbouring sites to create a coherent masterplan that brings about rationalised development parcels and allows for efficient building layouts.	The site falls within flood zone 3a and a critical drainage area where surface water flooding is prevalent. The southern and eastern areas of the site are also identified as particularly at risk of surface water flooding. There is no surface drainage currently on site.
Establishing built frontage along Lower Road and creating a street environment defined by buildings and less dominated by the presence of vehicles.	Significant air and noise pollution are generated from rail and road transport routes adjacent to the site.
Enhancing the adjacent SINC and alleviating flood risk by treating it as a green asset that could be extended across the site and integrated with development.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Streets and public spaces: Work in partnership with **BEL02 Station Road East** to create a network of streets and public spaces which establish new legible routes between Belvedere station, Picardy Manorway and Frank's Park.

A new station entrance: Explore ways to futureproof the north-eastern corner of the site to provide development that could be integrated with a new station entrance onto Picardy Manorway.

Unlocking development: A phased approach is encouraged that would allow for retail uses to remain active whilst the site is being intensified. A phased approach would also allow development to respond to future increases in connectivity. Earlier phases could focus on working in partnership with neighbouring site **BEL02 Station Road East** to provide mixed-use development across the southern half of the site with direct access to Lower Road. Later phases could then concentrate on building out a block structure in the place of the present retail warehouse which could respond to subsequent changes in connectivity around Belvedere station. The site should be considered in the context of the surrounding site allocations and developers should look to work in partnership with adjacent landowners to ensure the cluster is developed coherently and development opportunities are optimised.

Height and massing: Perimeter blocks between 4 and 8 storeys. Taller buildings up to 15 storeys could be used to signify the location of station entrances. Consider focussing height along the railway edge and use of a regular rhythm of massing along the northern boundary to deliver a strong and distinctive sense of arrival at Belvedere station.

Parking provision: The functional and visual impact of car parking should be minimised, for example by incorporating parking within the new block structure. Proposals should avoid using large portions of the site as surface car parking.

Ecology and landscaping: The creation of a landscaped buffer along the site's eastern boundary could create an enhanced SINC environment, provide a buffer from the noise and air pollution of Picardy Manorway and provide a landscaped setting for a taller building sitting in the north-eastern corner of the site.

Flood risk: An offset from any built structure to the watercourse, which runs adjacent to the sites northern and eastern boundaries, should be observed. Discharge routes will need to be established to alleviate surface water flood risk.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
3.315	2.487 (assumes residential above ground floor)	2 to 3	3a	Single ownership	Retail with car parking	District town centre

Table 16: ASDA and B&Q Belvedere site summary information

Other guidance

Car parking: The development must be informed by a parking demand survey looking at demand across the town centre and the role that the site can play in meeting demand. The appropriate level of car parking should be informed through discussion with the Highway Authority.

Archaeology: The site falls within a Tier 3 Archaeological Priority Area and exceeds 2 hectares. Development of the site would be considered a 'Large Major Development.' An Archaeological Assessment would need to accompany a planning application.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS23. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: The north-western portion of the site is identified as being deficient in access open space. Refer to Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets including ancient woodland. The site is within 500m of Ancient Woodland. Also Refer to Bexley SINC Report: Belvedere Dykes SINC Ref.BxBI02, strategic green wildlife corridor network map and corridor 2 and 9. An Ecological Impact Assessment will be required to inform design.

Environmental quality: Rail noise affects parts of the site. Refer to Development Plan policies.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BEL02 Station Road East

Station Road, Belvedere

SA4 BEL02 Station Road East

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development. The design-led approach for optimising site capacity suggests that a minimum of 81 new homes can be achieved on this site.

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, proposals should create a gateway to Belvedere for pedestrians and cyclists. A new public square should be created in front of Belvedere station extending along Station Road, incorporating the existing line of mature trees along the western edge of the site, and introducing town centre uses fronting onto the square. The existing health facility must be provided either onsite, or at another suitable location within the town centre. Proposals for this site should not result in harmful piecemeal development.

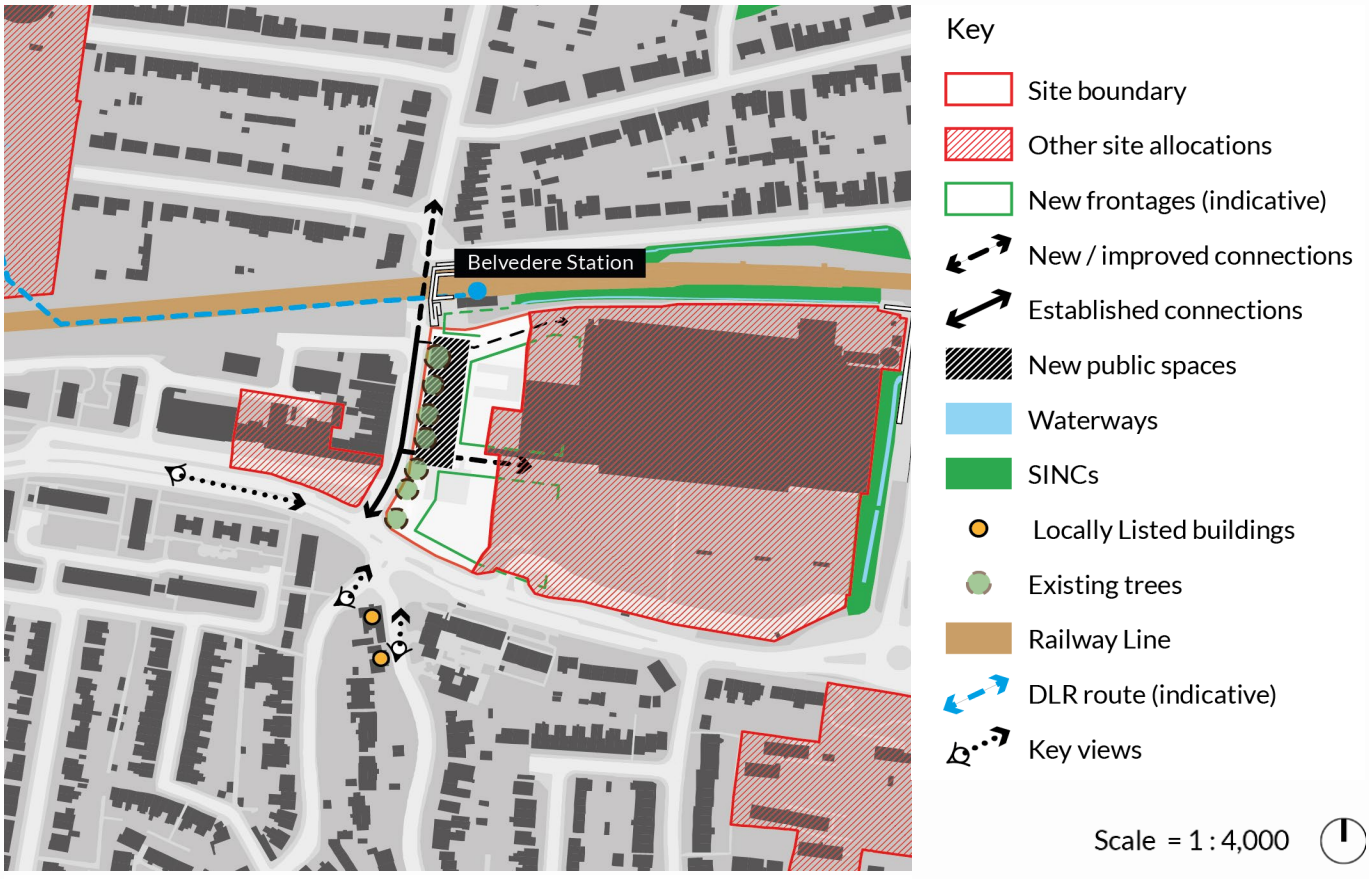


Figure 19: Station Road East site map and details

Site and surroundings

This is a medium sized brownfield site (0.63 ha) which fronts Station Road and forms a prominent corner with Lower Road. It is comprised of several separate parcels of land and is occupied by a family health clinic

and an electricity substation. A line of mature trees runs along the site's western boundary and a parade of shops forming site allocation **BEL03: Station Road West** sits opposite.

Neighbouring the site to the east is **BEL01: ASDA and B&Q Belvedere**, a large retail warehouse which gains access for deliveries and servicing from Station Road via a route along the site's northern boundary. Belvedere Station sits adjacent to the site at the end of Station Road (the main route to Belvedere Station on the south side of the railway line) and three bus routes (229, 401, 469) also stop directly outside the site boundary.

Opportunities and constraints

Opportunities	Constraints
Intensifying a sparse site that is adjacent to Belvedere station and has access to good levels of public transport provision and potential future transport interventions including a DLR terminus, extension of Crossrail, and a new station entrance.	Land along the site's northern boundary, adjacent to the railway, may need to be safeguarded to ensure that aspirations for a Crossrail extension and DLR can be delivered to Belvedere station.
Providing a high-quality public space outside of Belvedere station and creating a positive gateway into Belvedere for pedestrians and cyclists that is fronted by town centre uses.	A health clinic is located on the site. Development proposals will be expected to provide a new health facility within the town centre to ensure that a continued provision of health infrastructure is delivered within a sustainable location.
Increasing development potential by working in partnership with neighbouring sites to create a coherent masterplan that brings about rationalised development parcels and allows for the use of efficient building layouts.	The site is comprised of multiple parcels in separate ownerships. Individual landowners will need to work together to unlock the full potential of the overall site and engage with neighbouring sites to ensure development is advanced in an integrated manner across the wider area.
Working in partnership with neighbouring sites to improve local levels of permeability around Belvedere station and to safeguard for new routes that better integrate the station with the wider Belvedere area.	The site falls within flood zone 3a and a critical drainage area where surface water flooding is prevalent. Refer to other guidance section below for additional information on flood risk.
Introducing residential development above town centre uses as part of a mixed-use scheme that within Lower Belvedere town centre.	
Contributing positively to wayfinding when approaching the site along Picardy Street, Picardy Road and Lower Park Road.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Streets and public spaces: Create a high-quality streetscape along Station Road which incorporates the line of mature trees running along the site's western boundary. Expand the public realm to create a new

public square in front of Belvedere station. Use permeable paving materials to help alleviate risks of surface water flooding issues. Ensure development contributes to and safeguards the potential for the creation of a new street network across **BEL01 ASDA and B&Q Belvedere** that links Belvedere station to Picardy Manorway and which leads towards Frank's Park. The site should be considered in the context of the surrounding site allocations and developers should look to work in partnership with adjacent landowners to ensure the cluster is developed coherently and development opportunities are optimised.

Blocks and building heights: Work in partnership with **BEL01 ASDA and B&Q Belvedere** to create a rational block structure which optimises development potential and allows for new connections to be made between Station Road and the wider Belvedere area. Carefully consider the architectural treatment at the junction of Station Road and Picardy Street to ensure this prominent corner positively contributes to wayfinding when approaching the site. Consider using a taller building at this corner up to 15 storeys in height which forms part of a larger perimeter block that is lower in height.

Uses: Deliver a new health facility and other town centre uses at ground floor level fronting Station Road and the public square and provide residential accommodation above.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
0.630	0.473 (assumes residential above ground floor)	3	3a	Multiple ownership, including Council ownership	Community facilities; utilities infrastructure	District town centre

Table 17: Station Road East site summary information

Other guidance

Archaeology: The site is located with Tier 3 of the Archaeological Priority Area. Development would be required to undertake an archaeological assessment.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS24. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: The north-western portion of the site is identified as being deficient in access open space. Refer to the Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to the Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets including ancient woodland. The site is within 500m of Ancient Woodland. Also refer to the Bexley SINC Report: Belvedere Dykes SINC Ref.BxBI02, and strategic green wildlife corridors 2 and 9. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BEL03 Station Road West

Station Road and Picardy Street, Belvedere

SA5 BEL03 Station Road West

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development. The design-led approach for optimising site capacity suggests that a minimum of 38 new homes can be achieved on this site.

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, proposals should focus on improving the streetscape along Station Road, strengthening views to and from Belvedere station, and reinforcing Station Road as an approach to the station for pedestrians and cyclists. Development of the site should ensure natural surveillance of all street spaces. Proposals should not result in harmful piecemeal development.

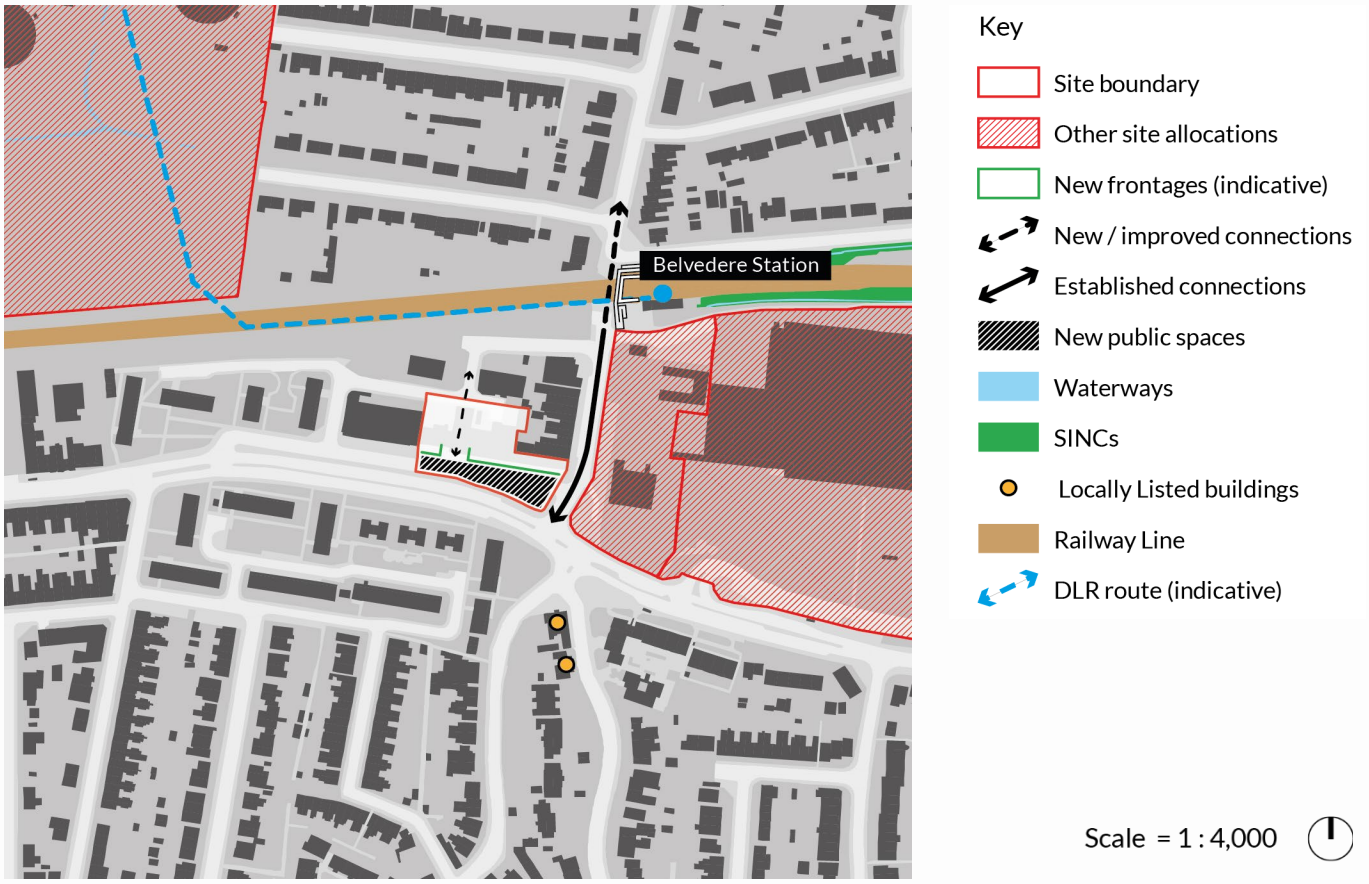


Figure 20: Station Road West site map and details

Site and surroundings

This is a medium sized brownfield site (0.62 ha) which sits next to Belvedere Station. The site addresses Station Road (the main route to Belvedere station on the south side of the railway line) and Lower Road (a

wide main thoroughfare). The site is comprised of low-rise linear blocks facing Lower Road. Buildings have commercial uses at ground floor level with office / storage or residential accommodation above.

On the south side of Lower Road, maisonette blocks sit opposite the site with their flank walls facing the street. To the west is a single storey parade of shops alongside further blocks of maisonettes and to the east is a short terrace fronting Station Road with commercial uses at ground level. **BEL02 Station Road East** and **BEL01 ASDA and B&Q Belvedere** form a large cluster of site allocations to the east. Three bus routes (229, 401, 469) stop near the site boundary.

Opportunities and constraints

Opportunities	Constraints
Intensifying land uses near Belvedere station.	The site falls within flood zone 3a and a critical drainage area where surface water flooding is prevalent.
Introducing a significant amount of new residential development as part of a mixed-use scheme within Lower Belvedere town centre.	The site is surrounded by existing built up areas which are relatively low rise.
Contributing towards establishing a sense of arrival when travelling towards the new Belvedere town centre from the west by road.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. Given the size of the site and character of the area, it is considered that the minimum capacity specified in the Policy will be similar to the optimum capacity.

Streets and public spaces: Create a high-quality streetscape along Picardy Street that is fronted by town centre development at ground floor level. The development should provide visual links to Belvedere station from Picardy Street.

Blocks and building heights: The development should optimise space including by building upwards whilst respecting the existing buildings to the west and the east, which are relatively low-rise. There is potential for significant additional height as the site moves towards the railway line, ranging from 3/4 storeys fronting Picardy Street rising to over 10 storeys towards the rear of the site.

Uses: Provide town centre uses at ground floor level fronting Picardy Street with residential accommodation fronting a realigned Railway Place and on upper floors.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
0.304	0.228 (assumes residential above ground floor)	3	3a	Multiple ownership, including Council ownership	Town centre uses (Use Class E); residential; community facilities	District town centre

Table 18: Station Road West site summary information

Other guidance

Archaeology: The site is located with Tier 3 of the Archaeological Priority Area. Development would be required to undertake an archaeological assessment.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS26. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: The site falls within an area identified as being deficient in access to open space. Refer to the Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to the Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets including ancient woodland. The site is within 500m of Ancient Woodland. Also refer to Bexley SINC Report: Belvedere Dykes SINC Ref.BxBI02, and strategic green wildlife corridors 2 and 9. An Ecological Impact Assessment will be required to inform design.

Environmental quality: Road and rail noise affect parts of the site, as do high levels of NOx emissions from vehicles. Refer to Development Plan policies, and the local plan transport assessment Chapter 10 on Air Quality.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BEL04 Land adjacent Woodside School

Halt Robin Road, Belvedere

SA6 BEL04 Land adjacent Woodside School

Land use and capacity

1. This site is allocated for primarily residential development. The design-led approach for optimising site capacity suggests that a minimum of 138 new homes can be achieved on this site.

Development approach

2. Development of this site should enhance the area. As well as meeting other policy requirements, proposals should respond to the steep and varied topography of the site, using a variety of typologies, incorporating changes in levels and varying building heights to enhance views into and out of the site. Pedestrian routes should be introduced through the site, especially onto Lower Road to improve access to Belvedere station, and onto Halt Robin Road to improve access to Woodside School and Frank's Park.

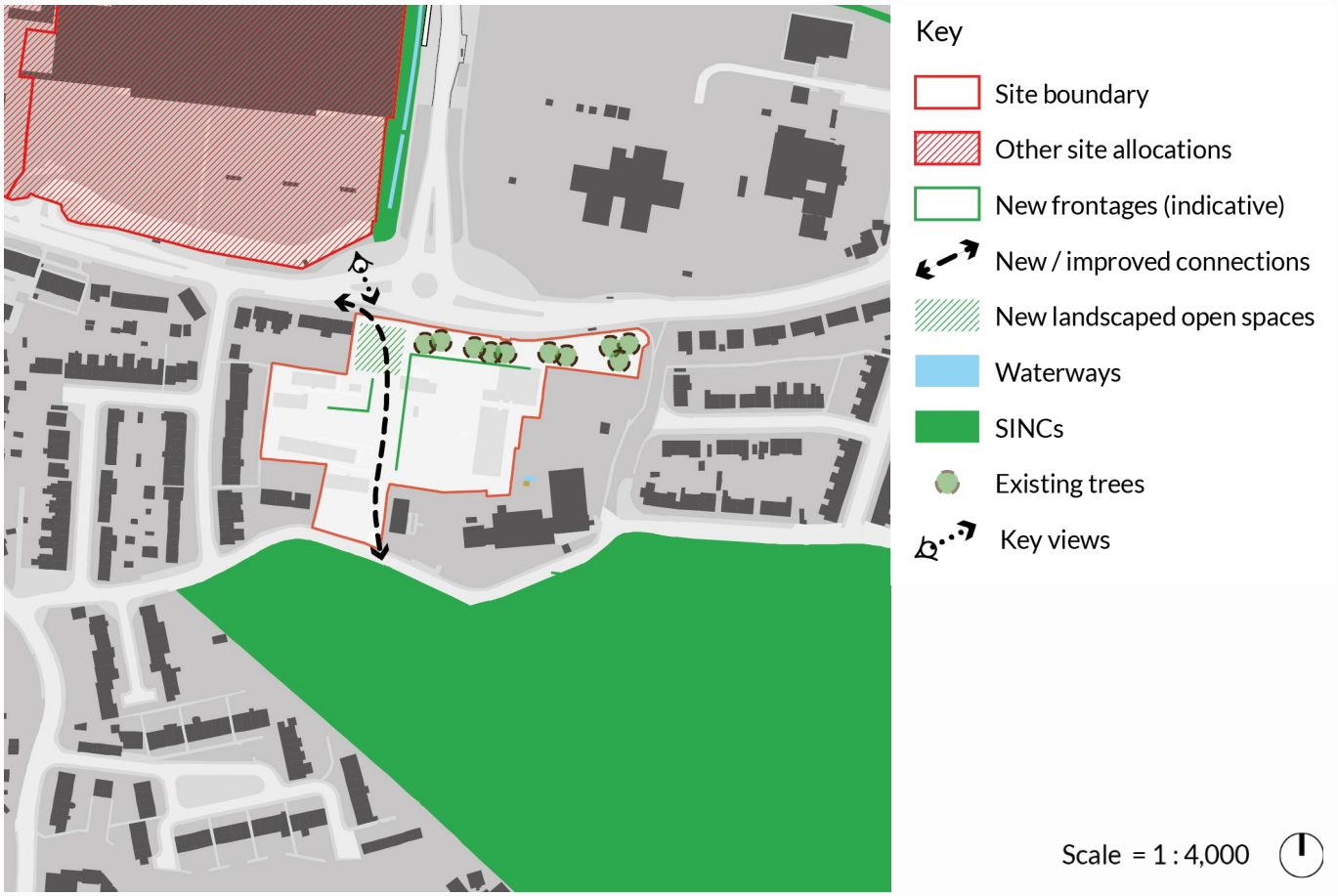


Figure 21: Land adjacent Woodside School sitemap and details

Site and surroundings

The land adjacent Woodside School is a large brownfield site (1.88 ha) that sits in an elevated position next to Frank's Park. Land levels fall along the site's northern boundary down towards Lower Road with mature

trees and vegetation occupying the bank. The site is occupied by several vacant school buildings and a games area.

To the south east of the site, the main Victorian school building stands outside the site boundary fronting Halt Robin Road and Frank's Park. Flatted blocks and town houses back onto the site along its western boundary. Footpaths lead down from the site towards Lower Road which faces Belvedere station whilst three bus routes (229, 401, 469) are within walking distance.

Opportunities and constraints

Opportunities	Constraints
Intensifying a site that is surplus to educational requirements within walking distance to Belvedere Station and with access to moderate levels of public transport provision.	Vehicular access to the site is provided off Halt Robin Road with changes in land levels separating the site from Lower Road. This access arrangement is likely to be a constraint on development and on vehicular movements across the site.
Drawing inspiration and character from the neighbouring Victorian school building and responding to it in a sympathetic manner.	Residential plots back on to the site with low-lying housing being present to the north of the site along Lower Road. Potential issues around overlooking and overshadowing.
Allowing residential accommodation to gain views north over low-lying land towards the River Thames.	The site falls within a critical drainage area, where surface water flooding is prevalent.
Improving local permeability and the site's accessibility to Belvedere Station by re-establishing pedestrian footpaths down towards Lower Road.	
Embracing grade variations across the site and using changes in land levels to design in servicing and parking and inform street structure.	
Helping with wayfinding by making a positive visual contribution at the junction of Lower Road and Picardy Manorway when approaching the site from the north.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. Given the size of the site and character of the area, it is considered that the minimum capacity specified in the Policy will be similar to the optimum capacity.

Make use of the heritage asset: The main Victorian school building is not located within the development, but it does provide a potential focal point around which the site could be developed, in terms of layout and appearance. Although the building is not a designated heritage asset, it exhibits a distinct character to which the development can respond in an appropriate and sympathetic manor.

Make use of the topography: The development should embrace the unique topography of the site and not attempt to impose a standard development layout and typology onto unsympathetic land conditions.

Layout, heights and massing: The varied topography of hills at different degrees broken with level surfaces provides unique opportunities in terms of a naturalistic layout, heights and views. Amenity space and

parking should similarly resist formal layouts and instead be scattered across the site, particularly where a break between buildings would allow for views across the Thames floodplain. The rising topography provides opportunity for taller buildings that would have a greater impact on a flatter landscape, because the relative rise of the land behind the buildings reduces the visual impact. Building heights and orientations should be designed to maximise outlooks across the Thames floodplain, and to avoid overlooking and overshadowing the adjacent housing along Halt Road and Lower Roads.

Streets: The site could be served primarily by Halt Robin Road, utilising the existing access from that road and/or with additional access. The footpath from Lower Road should be upgraded, which would improve permeability and enhance access to Frank's Park. A potential green route running from Frank's Park across Belvedere should be facilitated through the site.

Site area (hectares)	Residential site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
1.320	1.229	2	1	Council ownership	Vacant buildings	Primarily residential area

Table 19: Land adjacent Woodside School site summary information

Other guidance

Risk of flooding: Refer to the Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID AS56. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Biodiversity: Refer to the Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets including ancient woodland. The site is adjacent to Franks Park Ancient Woodland. Also refer to the Bexley SINC Report: Franks Park SINC Ref.BxBI03, and strategic green wildlife corridors 2 and 9. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: High levels of NOx emissions from vehicles affect parts of the site. Refer to Development Plan policies, and the Local Plan Transport Assessment Chapter 19 on Air Quality

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BEL05 Belvedere Gas Holders

Yarnton Way, Belvedere

SA7 BEL05 Belvedere Gas Holders

Land use and capacity

1. This site is allocated for primarily residential development with green, open spaces. The design-led approach for optimising site capacity suggests that a minimum of 395 new homes can be achieved on this site.

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, proposals should establish a legible internal network of routes that connect to the existing street network and should create a green linear route through the site. Proposals should not preclude public transport routes through the site. Proposals should also provide significant habitat enhancement on the south-western part of the site, in order to restore and enhance its wildlife function, and its function as part of a strategic green corridor.

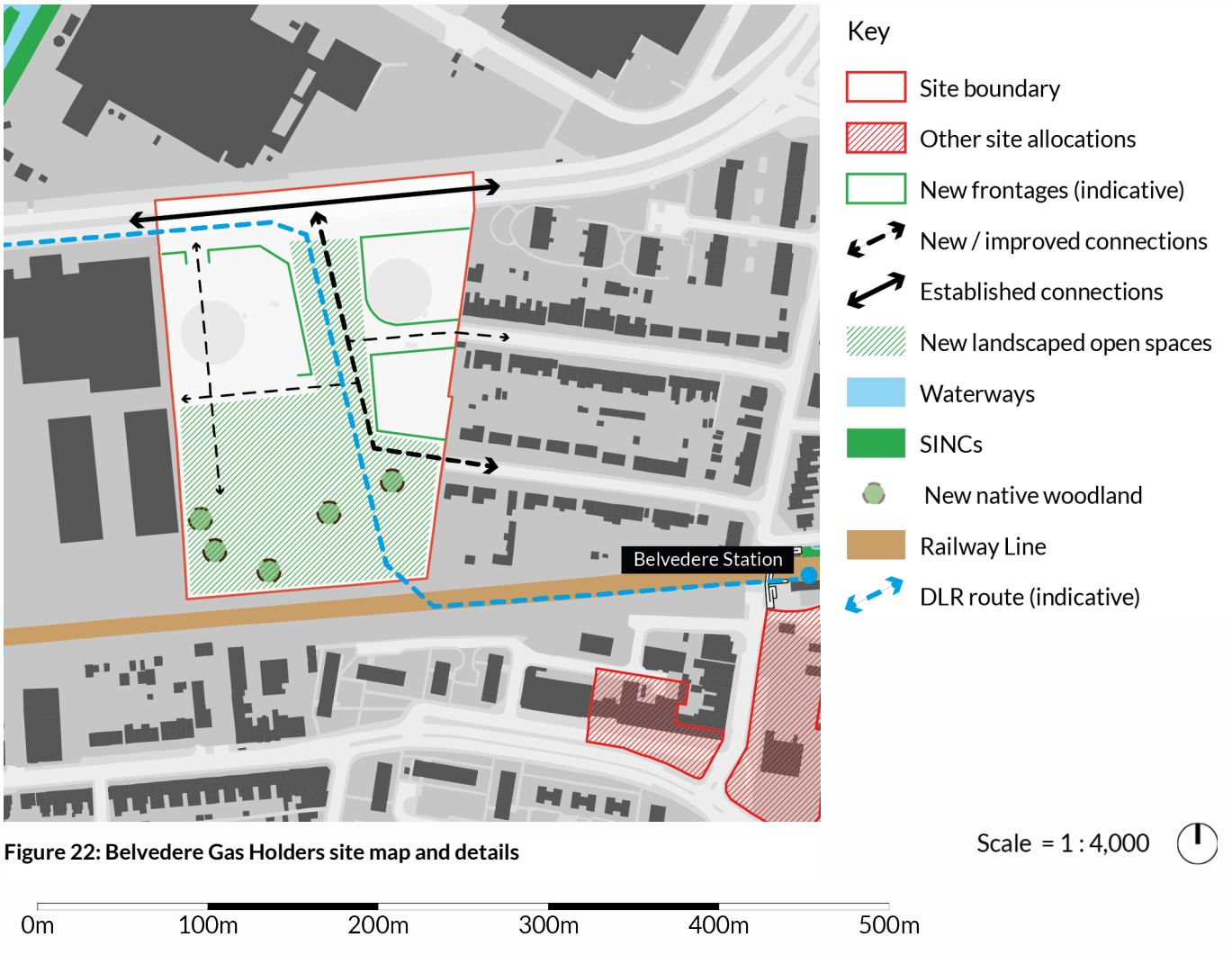


Figure 22: Belvedere Gas Holders site map and details

Site and surroundings

Belvedere Gas Holders is a large site (3.53 ha) that sits north of the North Kent railway line within walking distance to Belvedere Station. The site fronts Yarnton Way, a main thoroughfare. It is occupied by two large gas holder structures which are now surplus to requirements due to upgrades being undertaken to pressurise the gas network.

In addition to the two gas holders, a significant amount of vegetation is present which adjoins the linear strategic green wildlife corridor which runs along the site's southern boundary following the route of the railway line. Industrial uses on industrial land neighbour the site to the east whilst the residential streets of Sutherland Road and Maida Road run between Belvedere Station up to the site's eastern boundary.

Opportunities and constraints

Opportunities	Constraints
Dismantling aged industrial infrastructure and creating a significant new residential quarter within walking distance of Belvedere Station and Belvedere town centre.	The site contains two derelict gas holders. These will need to be disassembled and the land decontaminated prior to development.
Facilitating the route of DLR between Yarnton Way and Belvedere Station and potentially incorporating a station stop at the heart of a new residential quarter.	The site falls within flood zone 3a and a critical drainage area where surface water flooding is prevalent.
Improving the quality of the strategic green wildlife corridor and improving deficiencies in access to nature through the retention and enhancement of mature vegetation and tree coverage.	Land across the site and along the site's southern boundary (adjacent to the railway) may need to be safeguarded to ensure that aspirations for Crossrail and DLR can be delivered to Belvedere Station.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Integrate development with green infrastructure: Integrate the site with the surrounding area by establishing a network of streets and public spaces which connect with Sutherland Road and Maida Road. Establish accessible links to an area of species rich woodland habitat in the southern part of the site; and focus development onto a new green linear route that would provide a comfortable landscaped street environment capable of supporting a DLR route across the site. Design should maximise opportunities to support, restore and enhance the wildlife function of natural assets.

Blocks and building heights: Establish a consistent building line along Yarnton Way and ensure that new routes across the site are well defined by built form. Explore ways in which the gas holders might inform the alignment of building lines to provide a reminder of the site's past industrial use. Use architecture and massing to reinforce the importance of those street spaces with an important transit function and consider the use of tall buildings up to 15 storeys to provide emphasis along the proposed DLR route.

Uses: Deliver residential accommodation using the site's ecological features as an asset to enhance the quality of environment for residents. Consider the use of maisonettes at ground and first floor levels to

provide front doors on to the street whilst allowing for an internal arrangement of living space that could mitigate against the risk of flooding.

Site area (hectares)	Residential site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
3.534	2.220	2	3a	Single ownership	Decommissioned utilities infrastructure	Primarily residential area

Table 20: Belvedere Gas Holders site summary information

Other guidance

Archaeology: The site is located with Tier 3 of the Archaeological Priority Area. Development would be required to undertake an archaeological assessment.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS27. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Nature and open space deficiency: The north-western part of the site falls within an area that is deficient in both access to nature and open space. Refer to Bexley Green Infrastructure Study, including Chapters 6 and 10.

Biodiversity: The site is within 500m of Ancient Woodland. Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets including ancient woodland and SSSIs. Refer to Bexley SINC Report for designated SINC, including Lesnes Abbey Woods and Bostall Woods SINC Ref.M015, Erith Marshes SINC Ref.M041, BxBII02, and strategic green wildlife corridors 6 and 9. The pre-development biodiversity value of the onsite habitat is determined by the partial review of SINC 2019 survey of this site; and any additional value attributed to the site as part of the planning application process. An Ecological Impact Assessment will be required to inform design.

Trees: Significant and quality trees along with plans for restoration of woodland habitat should be identified at the start of outline design proposals so that layouts can take trees, the location of restored and enhanced species rich woodland habitat, and other green infrastructure into account early on. The pre-development value of the onsite trees is determined by the partial review of SINC 2019 survey of this site, refer to Bexley SINC Report, and the Bexley Green Infrastructure Study along with other sources of information from that time period; plus, any additional value attributed to the site as part of the planning application process. Refer to Bexley Green Infrastructure Study Chapter 9 on urban greening. Development would be required to undertake an arboriculture assessment.

Environmental quality: Rail noise affects parts of the site, and there is potential for land contamination from the sites former gas holders use. Refer to Development Plan policies.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BEL06 Monarch Works

Station Road North, Belvedere

SA8 BEL06 Monarch Works

Land use and capacity

1. This site is allocated for primarily residential development. The design-led approach for optimising site capacity suggests that a minimum of 90 new homes can be achieved on this site.

Development approach

2. Development of this site should transform the area. A s well as meeting other policy requirements, proposals should provide an east/west pedestrian and cycle route and a direct link to the existing pedestrian route under the flyover, to improve connections through to Belvedere station and town centre. Development should provide improved routes towards the new station entrances proposed to the south-west of the site, with high-quality public realm creating a sense of arrival. Proposals should not preclude public transport routes through the site. Proposals for this site should not result in harmful piecemeal development.

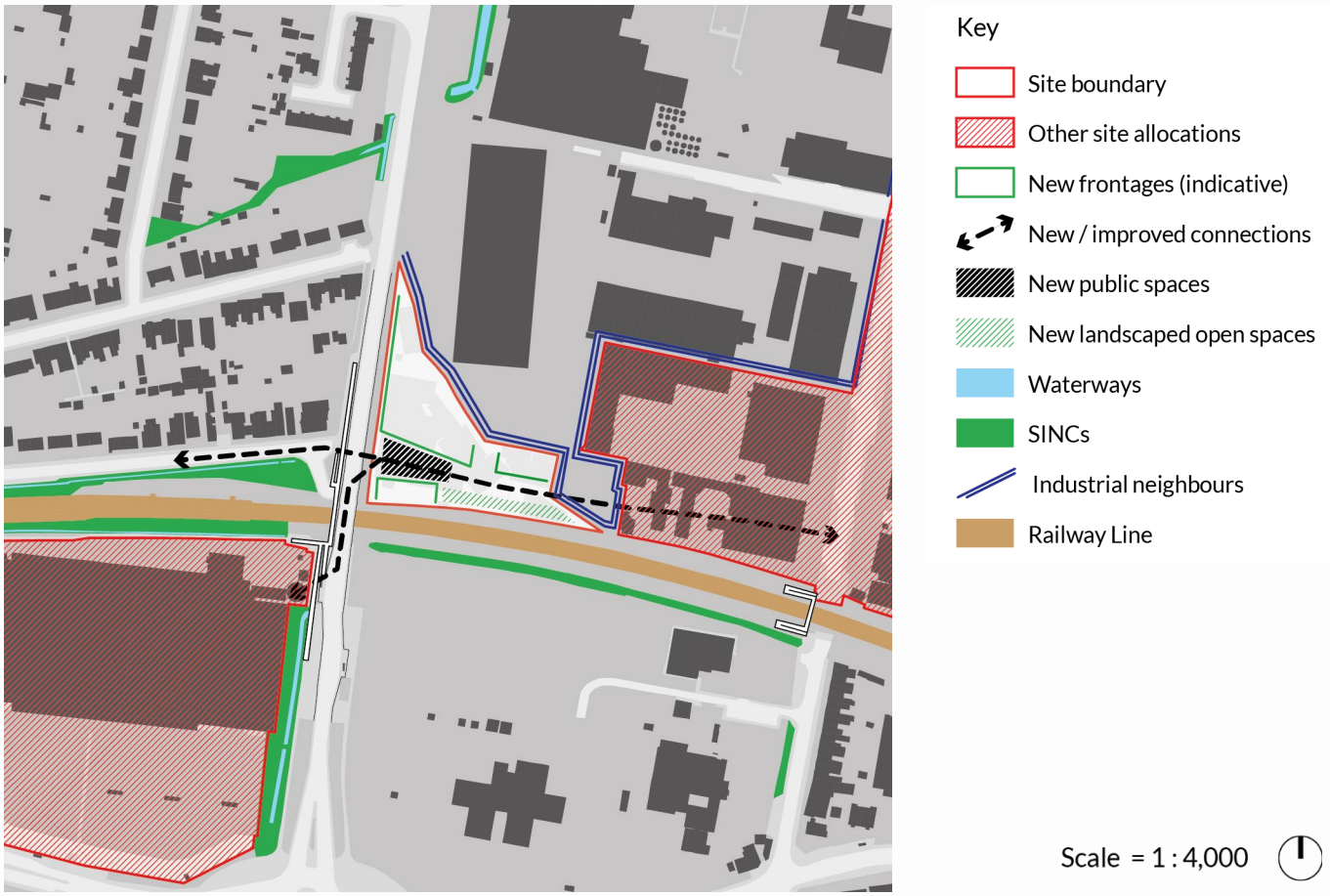


Figure 23: Monarch Works site map and details

Site and surroundings

Monarch Works is a medium sized brownfield site (0.63 ha) which occupies a visually secluded corner between Picardy Manorway flyover and industrial land on the northern side of the North Kent railway line. The site is comprised of a series of industrial buildings and gains access via Station Road North which passes underneath Picardy Manorway flyover. Belvedere Station is a 300m walk along Station Road North and site allocation **BEL07: Crabtree Manorway South** is located within 15m of the site's eastern-most tip.

Opportunities and constraints

Opportunities	Constraints
Delivering residential development within close proximity to Belvedere Station and Belvedere town centre.	Land along the site's southern boundary, adjacent to the railway, may need to be safeguarded to ensure that aspirations for a Crossrail extension, DLR and Bus Rapid Transit can be delivered to Belvedere station.
Facilitating new connections between the station and town centre and the wider Belvedere area and increasing levels of permeability east of Picardy Manorway and north of the railway line.	Access to the site is provided via Station Road North and is gained by passing underneath the Picardy Manorway Flyover. This access arrangement is a potential constraint on development and on vehicular movements.
Creating a sense of arrival at Belvedere station and providing high-quality public realm which would form part of a legible sequence of public spaces leading pedestrians and cyclists towards the east.	The site falls within flood zone 3a and a critical drainage area, where surface water flooding is prevalent. An offset from any built structure to the watercourses running opposite the western and southern boundaries of the site must be observed.
Supporting the creation of a new secondary station entrance onto Picardy Manorway flyover.	Neighbouring industrial uses in close proximity.
Facilitating part of a Bus Rapid Transit route between Belvedere station and Erith.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Streets and public spaces: Work in partnership with **BEL07: Crabtree Manorway South** to establish a street alignment that would safeguard for a connection between the two sites. Focus on increasing connectivity of pedestrians and cyclist and ensure that this new street could become part of a Bus Rapid Transit route.

Blocks: Use development to transition the height difference between ground level and Picardy Manorway flyover and provide a pedestrian connection over the railway line via a potential new station entrance towards **BEL01: ASDA and B&Q Belvedere**. Use development to define a new east/west street which would also serve as a 'barrier block' to neighbouring industrial uses.

Height and massing: Use architecture and an arrangement of buildings to define a new legible route towards the east and consider the use of a tall building up to 15 storeys which would mark the presence of a new entrance to Belvedere Station.

Uses: Deliver residential accommodation across the site and consider the use of maisonettes at ground and first floor levels to provide front doors on to the street whilst allowing for an internal arrangement of living space that could mitigate against the risk of flooding. Consider creating a car light development scheme with street space kept free from parked vehicles. Potentially make use of the area under the flyover for visitor parking and car club provision.

Site area (hectares)	Residential site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
0.630	0.630	2	3a	Single ownership	Industrial	Primarily residential area

Table 21: Monarch Works site summary information

Other guidance

Archaeology: The site is located with Tier 3 of the Archaeological Priority Area. Development would be required to undertake an archaeological assessment.

Open space deficiency: The site falls within an area identified as being deficient in access to open space. Refer to Bexley Green Infrastructure Study, including Chapters 6.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS28. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Biodiversity: Refer to the Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets including ancient woodland. The site is within 500m of Ancient Woodland. Also refer to Bexley SINC Report: Belvedere Dykes SINC Ref.BxBI02, and strategic green wildlife corridor 9. An Ecological Impact Assessment will be required to inform design.

Environmental quality: Rail noise affects parts of the site, as do high levels of NOx emissions from vehicles. Refer to Development Plan policies, and the Local Plan Transport Assessment Chapter 19 on Air Quality

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BEL07 Crabtree Manorway South

Crabtree Manorway South, Belvedere

SA9 BEL07 Crabtree Manorway South

Land use and capacity

1. This site is allocated for primarily residential development with green, open spaces. The design-led approach for optimising site capacity suggests that a minimum of 741 new homes can be achieved on this site.

Development approach

2. Development of the site should transform the area. As well as meeting other policy requirements, proposals should improve the permeability of the site by introducing a legible internal movement network. This network should allow improved access to Belvedere station, green views towards Frank's Park and should not preclude the ability to accommodate public transport routes including a bus rapid transit route. Proposals should also restore and enhance the Belvedere dikes SINC and provide high-quality green open space along Bronze Age Way focussed around the network of drainage ditches. Development of this site should not result in harmful piecemeal development. The proposal should be future-proofed to allow for later intensification of the site.

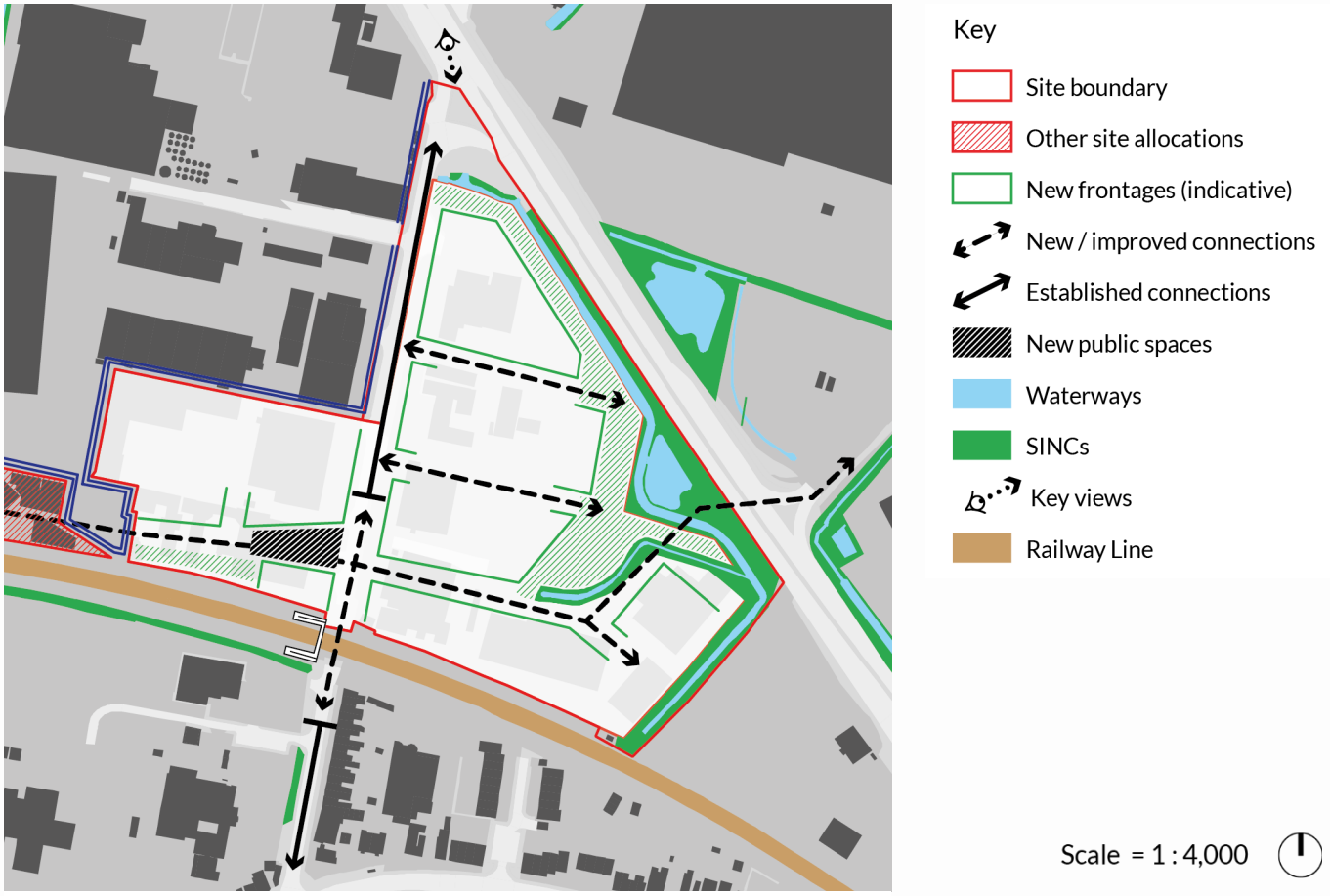


Figure 24: Crabtree Manorway South site map and details

Site and surroundings

Crabtree Manorway South is a large brownfield site (5.03 ha) that is located 500m east of Belvedere Station on the northern side of the North Kent railway line. Bronze Age Way and the railway line form the site's north-eastern and southern boundaries respectively and industrial land surrounds much of the site to the north and east. The site is comprised of a number of separate land parcels and industrial sheds and is bisected by Crabtree Manorway South. Site allocation **BEL06: Monarch Works** comes within 15m of the site's western boundary and a footbridge over the railway line puts the site within walking distance to schools, Belvedere Town Centre and three bus routes (229, 401, 469).

Opportunities and constraints

Opportunities	Constraints
Establishing a substantial new residential neighbourhood within walking distance of Lower Belvedere town centre established residential area and local amenities.	Vehicular access to the site is provided via Crabtree Manorway South. This route also provides neighbouring sites with their sole vehicular link on to the wider road network.
Creating substantial improvements in local permeability around Belvedere station by working in partnership with neighbouring sites. Contributions are likely to be sought for junction improvements at Bronze Age Way as well as a replacement pedestrian bridge over the railway to Mitchel Close.	Development proposals will be expected to consider how other land parcels within the wider industrial area could come forward in the future to avoid piecemeal development and allow for a rational structure of future streets and blocks.
Facilitating the running of a Bus Rapid Transit route linking Belvedere station to Erith and bringing improvements to local connectivity.	Existing industrial uses next to the site will likely place a constraint on the form of new residential development.
Meaningfully contributing to the creation of a new open space which would address the site's deficiency in access to open space.	Development will need to consider how to mitigate against noise generated from Bronze Age Way and the railway line.
Reducing flood risk by improving surface water runoff; and improving the amenity, ecology and environmental value of the watercourses, which run through and adjacent to the site.	The site falls within flood zone 3a, a critical drainage area where surface water flooding is prevalent, and is at potential risk of elevated groundwater levels.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Streets and public spaces: Seek to improve accessibility across the site from east to west and work in partnership with **BEL06: Monarch Works** to create a street alignment that could establish a direct pedestrian and Bus Rapid Transit route through to Belvedere station and increase accessibility through the site into the surrounding area. Improve permeability of the site by introducing a legible internal movement network which establishes Crabtree Manorway South as a tree lined boulevard and a key north/south movement corridor providing green views towards Frank's Park and maintains vehicular access into the

site and its industrial neighbours. Future intensification of the site could be facilitated by providing parking in a way that would allow it to be later developed, subject to improvements in public transport accessibility.

Integrate development with green infrastructure: The design should positively incorporate the natural assets of the site, restoring and enhancing the Belvedere dykes SINC and should create a high-quality open space along Bronze Age Way that would enhance the environment around the network of drainage ditches. An offset will be required between any built structure and the watercourses on and adjacent to the site. Define the green space with buildings that have active frontages. Use the ditch network to inform the alignment of streets, incorporating them as part of the street scene.

Blocks and building heights: Establish a series of perimeter blocks with heights predominantly within the range of 4 to 8 storeys. Incorporate taller elements at locations within the street network that help to define the route of Bus Rapid Transit and provide emphasis at site entrances. Ensure that development blocks safeguard the potential of neighbouring land parcels to come forward as an integrated part of the block structure. Explore internal layouts and building orientations that could mitigate the impacts of industrial neighbours on residential amenity.

Uses: Deliver residential accommodation across the site and consider the use of maisonettes at ground and first floor levels to provide front doors on to the street whilst allowing for an internal arrangement of living space that could mitigate against the risk of flooding. Consider delivering a small shop at a point in the street network that would be visible and help support activate public space.

Parking: Deliver parking in a variety of ways and consider using approaches that would allow for parking to be phased out as connectivity increases. If parking is to be incorporate into street spaces, it should be in a manner that ensures that vehicles are not a dominant component of the street scene. Consider incorporating an element of podium parking within the block structure that is wrapped by active frontages with additional short-term parking that can be developed out as a later residential phase.

Site area (hectares)	Residential site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
5.971	5.033	0 to 2	3a	Multiple ownership	Industrial	Primarily residential area/SINC

Table 22: Crabtree Manorway South site summary information

Other guidance

Archaeology: The site falls within a Tier 3 Archaeological Priority Area and exceeds 2 ha. Development of the site would be considered a 'Large Major Development'. An Archaeological Assessment would need to accompany a planning application.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS29. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: The site falls within an area identified as being deficient in access to open space. Refer to Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets. The site is within 500m of Ancient Woodland. Also refer to Bexley SINC Report: Belvedere Dykes SINC Ref.BxBI02, and strategic green wildlife corridor 9. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

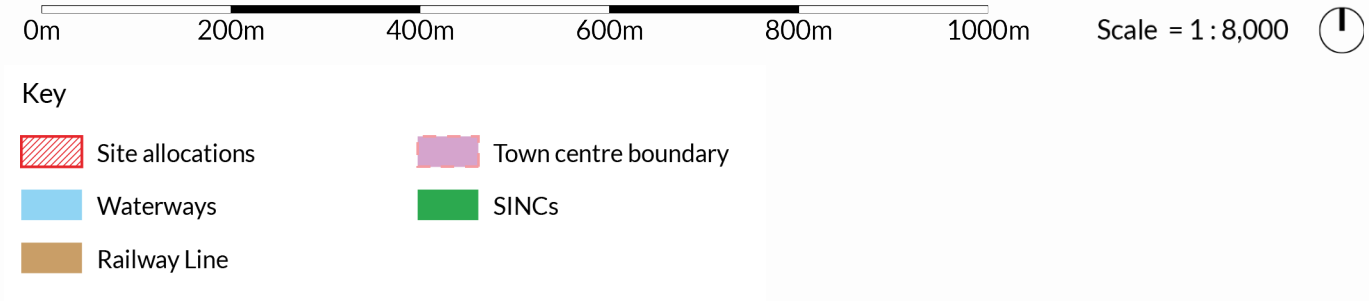
Environmental quality: Road and rail noise affect parts of the site. Refer to Development Plan policies.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

Erith sustainable development location



Figure 25: Town centre, railway station and surrounding area



Site Allocation	Site name
SA10	ERI01 Erith Western Gateway
SA11	ERI02 Pier Road West
SA12	ERI03 Pier Road East
SA13	ERI04 Erith Riverside
SA14	ERI05 Morrisons Erith

Table 23: List of site allocations in the Erith sustainable development location

ERI01 Erith Western Gateway

Saltford Close, Erith

SA10 ERI01 Erith Western Gateway

Land use and capacity

1. This site is allocated for primarily residential development including estate regeneration, with some town centre uses. The design-led approach for optimising site capacity suggests that a minimum of 443 new homes can be achieved on this site, replacing some existing housing, but retaining the two residential towers.

Development approach

2. Development of the site should transform the area. As well as meeting other policy requirements, proposals should retain and sensitively incorporate the locally listed buildings. A new internal network of streets should be created, including a north/south route along the previous Cross Street alignment and a new east/west route, serving as gateways into the site. Proposals should also, as a minimum, retain the existing amount of designated Urban Open Space to serve both residents and town centre users. Existing mature trees should be retained. Proposals should not preclude public transport routes through the site and should not result in piecemeal development.

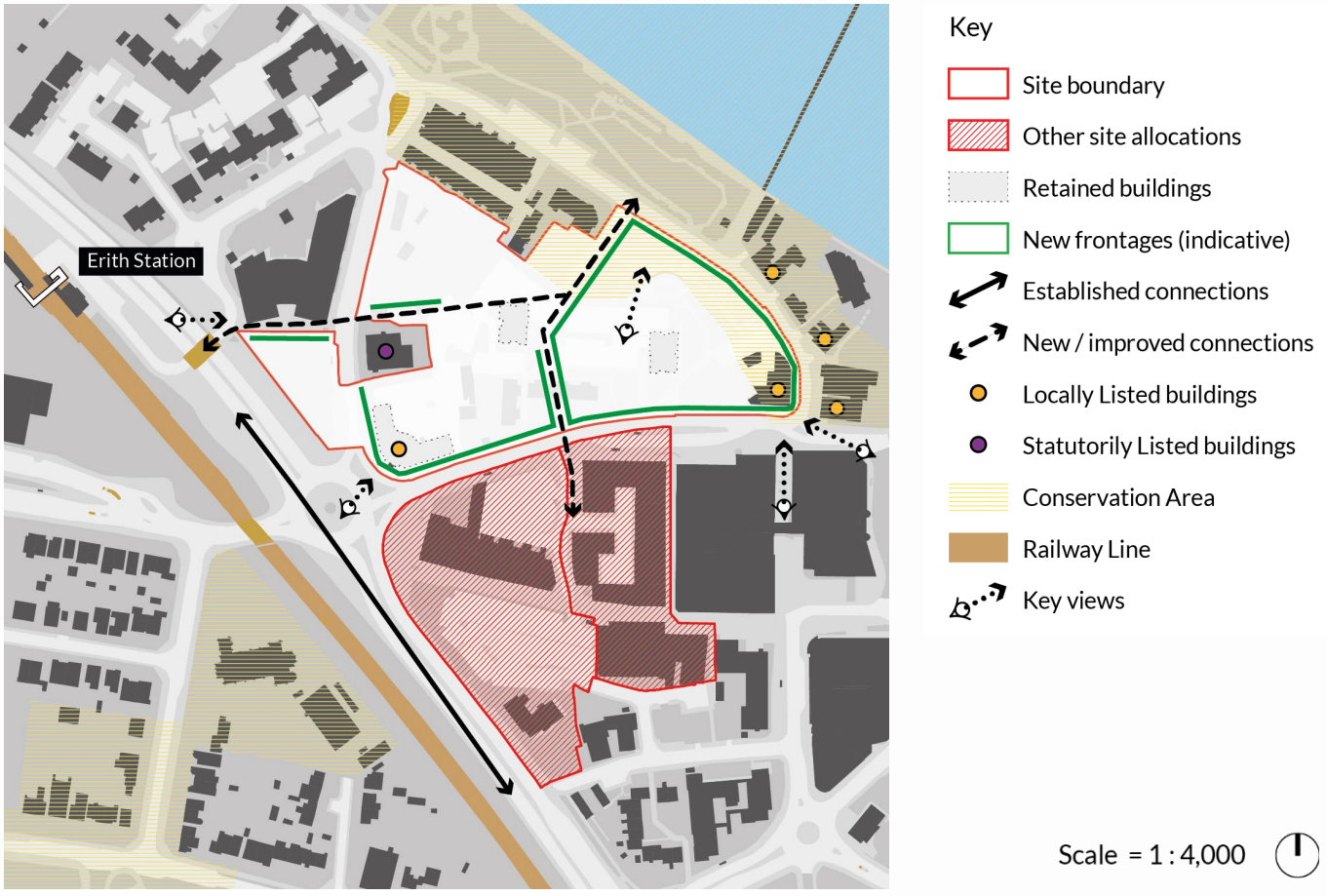


Figure 26: Erith Western Gateway site map and details

Site and surroundings

Erith Western Gateway is located north of **ERI02: Pier Road West** and **ERI03: Pier Road East**. It is a large, mostly developed site (3ha), characterised by a mix of commercial and residential uses. The site is occupied by two locally listed buildings, Erith Town Hall to the south west, and Erith Post Office and former Sorting Office to the east; there are two residential tower blocks towards the centre and significant areas of open space on site, including an area of designated Urban Open Space. The LEB Substation is within the site, adjacent to the Carnegie former library building to the west. Erith town centre boundary extends into the site at the south-east corner. East of the site is Erith train station, with direct connections to London Bridge and Abbey Wood; nearby bus stops serve the south of the borough. The River Thames is within 50m of the northern perimeter.

Opportunities and constraints

Opportunities	Constraints
Conservation area and neighbouring listed and locally listed buildings offer potential focus for regeneration and inspiration for character of the development.	Parts of the site to the north are located within Flood Zones 2 and 3 and the north-western corner is identified as at particular risk of surface water flooding.
Utilising existing green open spaces and mature vegetation.	LEB sub-station on the site immediately north of Carnegie Library.
Some buildings on the site already achieve good densities with sound structure.	Heritage assets on site and in immediate surrounding context.
Chance to restore the historic high street character lost as a result of the 1960s demolition programme.	Some buildings are expected to be retained which constrains layout and outlook.
Strong relationship with the river. Steep topography offers views to the River Thames and longer views across the Thames River valley.	Air and noise pollution along western edges of the site, particularly the portion of the site to the west of Walnut Tree Road.
New routes through the site can better integrate the town centre with the rail station and the river.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, given the character of this site, including existing housing and designated open space to be retained, it is considered that the minimum capacity in the Policy will be similar to the optimum capacity.

Make use of the conservation area: The site includes a section of the Erith Riverside Conservation Area, which focusses on the historic high street, including the group of historic buildings adjacent to the site, and the town's relationship with the River Thames. The site offers opportunities to recreate the historic typology of a high street through redevelopment of vacant spaces creating a sense of enclosure.

Make use of the historic buildings: The site contains two locally listed buildings – the former Town Hall and the Post Office – and is within the settings of other listed and locally listed buildings. The heritage buildings on the site must be retained and could serve as focal points within the development. The Town Hall should be restored and converted. The Post Office should only be extended where done in a sympathetic way and

with an extension that respects the height and massing of the original building and retains features of significance including the roof and the decorative urns.

Streets: The size of the site offers the opportunity to create a 'new piece of town' that facilitates movement throughout the site as well as connections between the station, town centre and the Riverside Gardens. A north/south route along the previous Cross Street alignment and a new east/west route should be provided, with these routes serving as gateways into the site.

Layout: Blocks should be arranged to reinforce this movement hierarchy, with the main routes fronted by active ground floor frontage and consistent building lines. Across the site, blocks should be laid out and orientated to maximise outlook to the River Thames and longer views across the river valley, exploiting the topography. Additionally, blocks must respond to the existing tower blocks, which will be retained.

Public open spaces: Public open spaces should improve the quality of existing provision, provide breaks within the built environment, maximise views to the Thames, and where they can utilise existing natural features, such as the mature trees to the south of the Town Hall.

Heights and massing: The gradient differential between the part of the site to the south of the college and the surrounding streets offers potential for a taller building. Across the site, heights should be designed to maximise outlook to the River Thames and longer views across the Thames River valley. Heights should be reduced towards the cluster of historic buildings on Erith High Street to mitigate any adverse impact on these heritage assets. Heights should reinforce the hierarchy of the existing and new movement network.

Site area (hectares)	Residential site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
3.000	2.508	3	1, 2 and 3a	Multiple ownership, including Council ownership	Town centre uses (Use Class E); residential; community facilities	Primarily residential area; urban open space; district town centre

Table 24: Erith Western Gateway site summary information

Other guidance

Archaeology: The site is located within a Tier 2 Archaeological Priority Area. An Archaeological Assessment would be required to be submitted to accompany a planning application and it should be noted that further interventions may be necessary.

Heritage: The adjacent Carnegie Library is a Grade II listed building. Development would be required to have due regard to the setting of this building by illustrating sensitivity to this designated heritage asset.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS36. A site-specific Flood Risk Assessment and detailed drainage strategy will be required to inform design.

Open space deficiency: The site falls within an area identified as being deficient in access to open space. Refer to Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Bexley Green Infrastructure Study (including figures 10.1 and 10.3) identifies biodiversity and geological assets; SINC Report: River Thames SINC Ref.M031; and strategic green wildlife corridors 9 and 11. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: Road noise and high levels of NOx emissions from vehicles affect parts of the site. Refer to Development Plan policies, and the Local Plan Transport Assessment: Chapter 10 on Air Quality.

Partnership working: The site is in multiple ownership and joint working will be required to ensure that the most effective use is made of the site and that constraints are effectively addressed. A master planning exercise or similar will be required to ensure development is properly coordinated.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

ERI02 Pier Road West

Bexley Road, Pier Road and Queen Street, Erith

SA11 ERI02 Pier Road West

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development. The design-led approach for optimising site capacity suggests that a minimum of 192 new homes can be achieved on this site along with, as a minimum, the re-provision of the existing floor space for town centre uses..

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, proposals should align blocks along Pier Road to create a sense of place and enhance the legibility of the route from the town centre to the Queens Road roundabout. Blocks should also create an attractive frontage onto Bexley Road to announce the town centre to the wider area. Proposals should also introduce north/south routes, linking with potential ongoing connections towards Riverside Gardens and the River Thames, and towards Queen Street Baptist Church. Proposals should not preclude public transport routes through the site. Town centre parking should be provided at an appropriate amount and designed to minimise its functional and visual impact. Proposals should not result in harmful piecemeal development, either within the site or across the wider urban block.

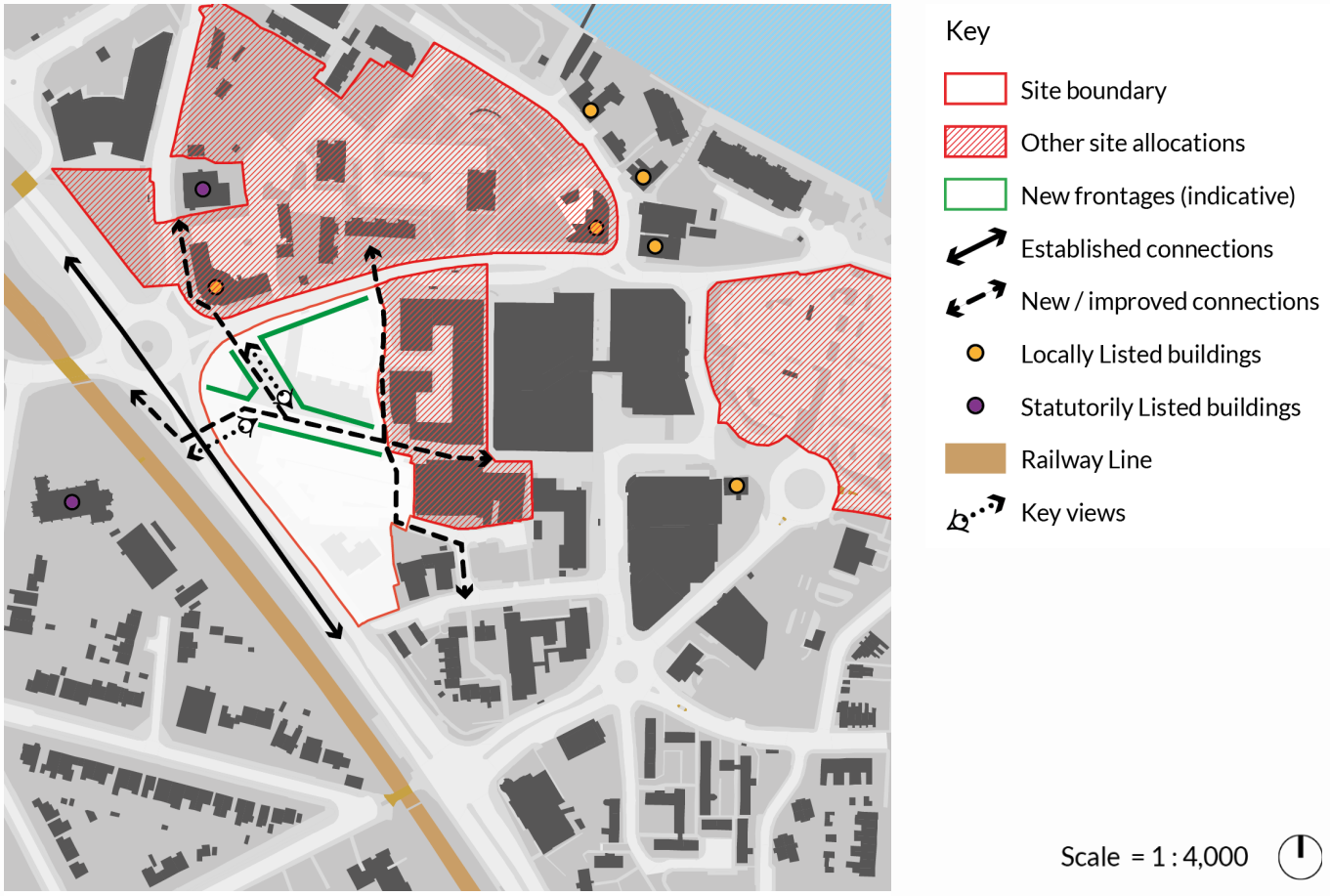


Figure 27: Pier Road West site map and details

Site and surroundings

Pier Road West is a brownfield site adjacent to **ERI03 Pier Road East** and south of **ERI01 Erith Western Gateway**. The site is characterised by mixed use commercial development to the north, a small office block to the south, and extensive surface level car parking. The site is located within the Erith town centre boundary, the shopping parade along Pier Road cutting east west through the centre of the site. Access to the site from the north is achieved via Bexley Road, and from the south via Elrick Close and Queen Street. The site is well serviced by bus routes to all parts of the Borough and is a short walk from Erith train station.

Opportunities and constraints

Opportunities	Constraints
Re-establish the late C19th urban grain through consolidation of Pier Road as the primary east-west walking and cycling route through Erith Town Centre.	There are statutory and local listed buildings to the west of the site and the Lesney Park Road Conservation Area is located to the west of the site.
Re-establish Cross Street as an important north-south route in the town centre providing more direct walking routes north from Pier Road.	High levels of noise pollution and NOx emissions across much of the site due to its proximity to the A206.
Structure visual links between Pier Road and Erith Town Hall and between Pier Road and Christ Church.	Parts of the site have a high risk of surface water flooding.
Rationalise parking, reducing its visual and physical impact.	Within an area of open space deficiency
Improve the presence of Queen Street Baptist Church.	Re-provision of parking.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Gateway to the town centre: The site should act as the gateway to Erith town centre, which is currently poorly defined. The built environment should indicate that a town centre lays beyond, including through landmark buildings framing Pier Road along the Queens Road roundabout.

Layout: Blocks along Pier Road should have active ground floor uses and consistent building lines to create a sense of urban enclosure and place. The arrangement should ensure a legible route linking Pier Road to the pedestrian crossing on Queens Road. Views of heritage assets should be framed, with a view along the route to Erith Town Hall and beyond culminating with the listed Christ Church. The blocks to the south of the site should frame the Queen Street Baptist Church, an attractive historic building.

Blocks, heights and massing: The arrangements of the blocks should create a strong consistent frontage to Pier Road whilst optimising the spaces to the rear, potentially with the use of perimeter blocks. Although the primary frontage is to Pier Road, blocks should not turn their backs from the rear of their sites and should create attractive frontage along Bexley Road and Queens Road. Massing should articulate the transition in scale and grain from sensitive areas such as Erith Town Hall.

Streets: Retain Pier Road as the main street. Streets are more legible and at human scale when they are broken up by side streets running perpendicular. For example, there is potential for short pedestrian route running north/north-west from Pier Road towards the Town Hall and to reinstate Cross Street through **ERI01 Erith Western Gateway** to create a new connection towards Riverside Gardens and the River Thames. Potential for a new route towards Queen Street Baptist Church would bring this attractive building within the urban grain.

Uses: Town centre uses should be located on the ground floor, primarily addressing Pier Road but also along Bexley Road and Queen Street where appropriate, with residential accommodation above.

Parking provision: The functional and visual impact of car parking should be minimised, for example by incorporating parking within the new block structure. Proposals should avoid using large portions of the site as surface car parking.

Future-proof against flood risk: Mitigate flood risk, for example by locating living accommodation above the maximum future flood level. Utilise SUDs to mitigate flood risk adjacent to the site's north-eastern corner.

Partnership working: Work in partnership with **ERI03 Pier Road East** to develop a consistency of character and a rational block structure that can straddle site boundaries. The sites should not come forward separately unless master planning or other work is presented to ensure that doing so would not represent piecemeal development.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
1.391	1.043 (assumes residential above ground floor)	3	1	Multiple ownership, including Council ownership	Town centre uses (Use Class E); residential; car parking	District town centre

Table 25: Pier Road West site summary information

Other guidance

Parking: The development must be informed by a parking demand survey looking at demand across the town centre and the role that this site can play in meeting demand. The appropriate level of car parking should be informed through discussion with the Highway Authority.

Archaeology: The centre of the site is located within a Tier 3 Archaeological Priority Area. As the site is a Tier 3 APA and over 0.5 ha, the site is assessed as medium risk on the GLAAS model. An application would be required to be accompanied by an Archaeological Assessment/Statement of Archaeological Significance.

Heritage: Several statutory and local listed buildings, and Lesney Park Road Conservation Area are located to the west of the site. Christ Church (Grade II*) and the Lesney Park Road Conservation Area are designated heritage assets. Development will be required to preserve the setting of these assets.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS38. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets. Also refer to Bexley SINC Report: River Thames SINC Ref.M031, and strategic green wildlife corridors 9 and 11. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: Road noise affects parts of the site, as do high levels of NOx emissions from vehicles. Refer to Development Plan policies, and the Local Plan Transport Assessment Chapter 10 on Air Quality.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

ERI03 Pier Road East

Bexley Road and Pier Road, Erith

SA12 ERI03 Pier Road East

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development. The design-led approach for optimising site capacity suggests that a minimum of 112 new homes can be achieved on this site along with, as a minimum, the re-provision of the existing floor space for town centre uses..

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, proposals should align blocks along Pier Road to create a sense of place and enhance the legibility of the route from the town centre towards the Queens Road roundabout. Blocks should also create an attractive frontage onto Bexley Road. Proposals should not preclude public transport routes through the site. Proposals should not result in harmful piecemeal development, either within the site or across the wider urban block.

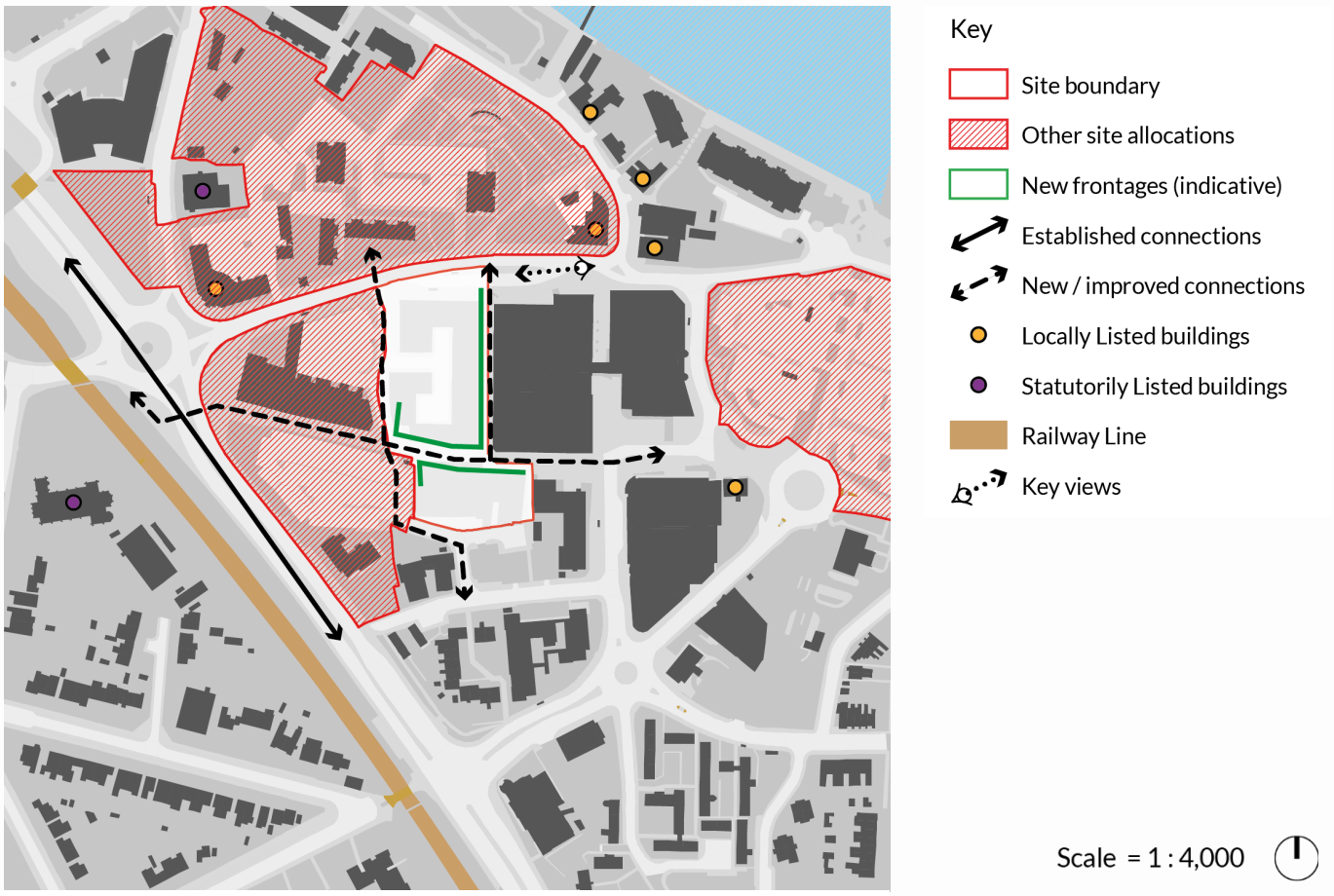


Figure 28: Pier Road East site map and details

Site and surroundings

Pier Road East is a brownfield site adjacent to **ERI02 Pier Road West** and south of **ERI01 Erith Western Gateway**. The site is characterised by commercial development, including the western part of Erith

Riverside Shopping centre. The site is located within the Erith town centre boundary; the shopping parade along Pier Road cuts east west through the centre of the site. Access to the site from the north is achieved via Bexley Road, and from the south via Elrick Close and Queen Street. The site is well serviced by bus routes to all parts of the Borough and is a short walk from Erith train station.

Opportunities and constraints

Opportunities	Constraints
Re-establish the late C19th urban grain through consolidation of Pier Road as the primary east-west walking and cycling route through Erith Town Centre through providing continuous, active frontages on both sides of the road. Re-establish Cross Street as an important north-south route in the town centre.	Parts of the site are at high risk of flooding from surface water. The site lies within an area identified at risk of reservoir flooding.
Flood risk and lack of planting and open space can be solved together through the incorporation of high-quality, multi-purpose landscaping.	Pier Road is within highways ownership.
Improve the presence of Queen Street Baptist Church by framing the building and strengthening the relationship between the building and Pier Road.	Underground utilities run along Pier Road.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Layout: Enhance the sense of place and reinforce the importance of the route by lining blocks along Pier Road. These blocks should have active ground floor uses and consistent building lines to create a sense of urban enclosure and place. The arrangement should ensure a legible route linking Pier Road to the pedestrian crossing on Queens Road and to Walnut Tree Road. The space should also frame views to heritage assets, with a view along the route to Erith Town Hall and a longer view beyond culminating with the listed Christ Church, creating visual connections with the town centre and these heritage assets. The blocks to the south of the site should frame the Queen Street Baptist Church, an attractive historic building.

Blocks, heights and massing: The footprints and arrangements of the blocks should create a strong consistent frontage to Pier Road whilst optimising the spaces to the rear, potentially with the use of perimeter blocks. Although the primary frontage is to Pier Road, blocks should not turn their backs from the rear of their sites and should create an attractive frontage along Bexley Road to the north. Massing should articulate the transition in scale and grain from sensitive areas such as Erith Town Hall.

Streets: Retain Pier Road as the main street. Streets are more legible and at human scale when they are broken up by side streets running perpendicular. Retain the north/south pedestrian route along the eastern edge of the site, fronted with active town centre uses.

Uses: Town centre uses should be located on the ground floor, primarily addressing Pier Road with residential accommodation above.

Partnership working: Work in partnership with **ERI02 Pier Road West** to develop a consistency of character and a rational block structure that can straddle site boundaries. The sites should not come forward separately unless masterplanning or other work is presented to ensure that doing so would not represent piecemeal development.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
0.841	0.631 (assumes residential above ground floor)	3	1	Multiple ownership, including Council ownership	Town centre uses (Use Class E)	District town centre

Table 26: Pier Road East site summary information

Other guidance

Parking: The development must be informed by a parking demand survey looking at demand across the town centre and the role that this site can play in meeting demand. The appropriate level of car parking should be informed through discussion with the Highway Authority.

Archaeology: The centre of the site is located within a Tier 3 Archaeological Priority Area. As the site is a Tier 3 APA and over 0.5 ha (1.24ha in size), the site is assessed as medium risk on the GLAAS model. An application would be required to be accompanied by an Archaeological Assessment/Statement of Archaeological Significance.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS37. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: The site falls within an area identified as being deficient in access to open space. Refer to Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets. Also refer to Bexley SINC Report: River Thames SINC Ref.M031, and strategic green wildlife corridors 9 and 11. An Ecological Impact Assessment will be required to inform design.

Other requirements: the Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

ERI04 Erith Riverside

Wheatley Terrace Road, Erith

SA13 ERI04 Erith Riverside

Land use and capacity

1. This site is allocated for primarily residential development. The design-led approach for optimising site capacity suggests that a minimum of 287 new homes can be achieved on this site.

Development approach

2. Development of this site should enhance the area. As well as meeting other policy requirements, proposals should introduce attractive residential development with a strong relationship with the River Thames, enhancing the riverside environment and extending the Thames Path public footpath. Proposals should also improve and extend existing routes to establish a legible internal network that connects to the existing street network and should not preclude potential public transport routes. Proposals should not result in harmful piecemeal development, either within the site or across the wider urban block.



Figure 29: Erith Riverside site map and details

Site and surroundings

Erith Riverside is a brownfield site, bound by the River Thames to the north, **ERI05 Morrisons Erith** shopping centre to the west, heavy industry to the east, and residential to the south. It is in an area of transitional character with a high level of variation; strong edges between industrial, commercial and residential uses characterise the site, as do its views onto the River Thames.

The site itself includes industrial uses served via James Watt Way and Wheatley Terrace Road, which cuts through the site, and from Manor Road to the south. There is an area of car parking on the western half of the site. The site lacks direct bus services to the south and east of the borough for local employment opportunities.

Opportunities and constraints

Opportunities	Constraints
Reinstate Wheatley Terrace Road as a key route with **ERI05 Morrisons Erith**, connecting back to the town centre and Pier Square to the west and to Manor Road to the east.	Work with the Council and TfL to safeguard a potential Bus Rapid Transit route through the site with **ERI05 Morrisons Erith**
Take advantage of riverside location, including providing public access to the river, extending the Thames Path, and maximising views from units within the development.	Adjacent industrial land to the east is noisy and polluting.
Design should support the wildlife function the River Thames SINC.	Flood risk on the northern parts of the site.
Incorporating open space within the development could address deficiency of open space within the area.	Land is in multiple ownership including some highways land and a covenant on part of the site.
Utilise existing mature trees along Appold Street.	Existing housing to the south could serve as a constraint on height and character.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

River Thames: The site provides one of the few opportunities within the borough for residential development directly on the River Thames. The development should enhance this riverside frontage including provision of an extended Thames Path public footpath, allowing for potential future onwards extension towards Erith Marshes, and should provide increased overlooking onto the Thames Path. Block heights, layout, and orientation should maximise access to and outlook onto this blue infrastructure.

Layout and heights and massing: A variety of building types should be used to create transitions in scale across streets and to address the patchwork of uses and existing context surrounding the site. Taller buildings with large windows could front the River Thames, whilst to the south of the site reduced heights and a variation in typology could provide a good transition to and strong relationship with the existing terraced housing to the south of the site. The layout should also consider providing a buffer between the

new blocks and the industrial site to the east, including potential amenity space, parking, and non-residential ground floor uses.

Uses: The site is appropriate for primarily residential use. Some suitable employment uses could be provided at ground floor in the eastern part of the site to create a buffer with the industrial site to the east.

Streets: There are several existing and historical routes within the site, which should be extended to form an internal movement network and integrated with the wider movement network. Wheatley Terrace Road should be reinstated as the key east-west route, connecting back to the town centre and Pier Square through the neighbouring **ERI05: Morrisons Erith**, and through this site to create an important connection with Manor Road. A direct link to Wharfside Close should be establish and Appold Street should be improved as the key north/south route. The junction of Wheatley Terrace Road and Appold Street could form a focal point and allow for views across the site towards the River Thames.

Thames path: The Thames Path should be extended across the entire northern edge of the site, accommodating its future continuation eastwards, whilst retaining a connection to the existing route along Manor Road in the interim.

Parking: The site currently includes an area of surface car parking to the rear of the Morrisons store. The development must be informed by a parking demand survey. Working with the Highway Authority, the appropriate level of parking should be provided across this and the neighbouring **ERI05 Morrisons Erith**.

Flood risk: Manage flood risk wherever possible, for example by locating living accommodation above the maximum future flood level. Utilise SUDS to mitigate flood risk.

Partnership working: The site should be conceived of as part of the opportunity for an urban extension represented by the size of the neighbouring **ERI05 Morrisons Erith**. Ideally these sites would be brought forward as a single development, but if land ownership issues do not allow for this then it is essential that partnership working is used to develop a consistency of character and a rational block structure that can straddle site boundaries. The movement network should seamlessly cross both sites. The sites should not come forward separately unless master planning or other work is presented to ensure that doing so would not represent piecemeal development.

Site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
2.620	1b to 2	1, 2 and 3a	Multiple ownership	Industrial (with some vacancy); car parking	Primarily residential area

Table 27: Erith Riverside site summary information

Other guidance

Archaeology: The site is located within a Tier 3 Archaeological Priority Area and is identified as medium risk when assessed against the GLAAS model. Any future submission would be required to be accompanied by an archaeological assessment.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS40. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Environmental quality: Road noise and noise from neighbouring uses affect parts of the site. Refer to Development Plan policies.

Open space deficiency: The site falls within an area identified as being deficient in access to open space. Refer to Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets. Also refer to Bexley SINC Report: River Thames SINC Ref.M031, strategic green wildlife corridor network map, corridor 9 and 11. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

ERI05 Morrisons Erith

James Watt Way, Erith

SA14 ERI05 Morrisons Erith

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development. The design-led approach for optimising site capacity suggests that a minimum of 421 new homes can be achieved on this site along with, as a minimum, the re-provision of the existing floor space for town centre uses.

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, proposals should contribute to the realisation of Pier Square as a vibrant public space. Buildings fronting on to Pier Square should be designed to frame the space and ground floor uses should create activity. Proposals should also establish a legible internal network of routes and should provide an improved vehicular link between Colebrook Street and James Watt Way. Proposals should not preclude public transport routes through the site. Town centre parking should be provided at an appropriate amount and designed to minimise its functional and visual impact. Development of this site should not result in harmful piecemeal development, either within the site or across the wider urban block.

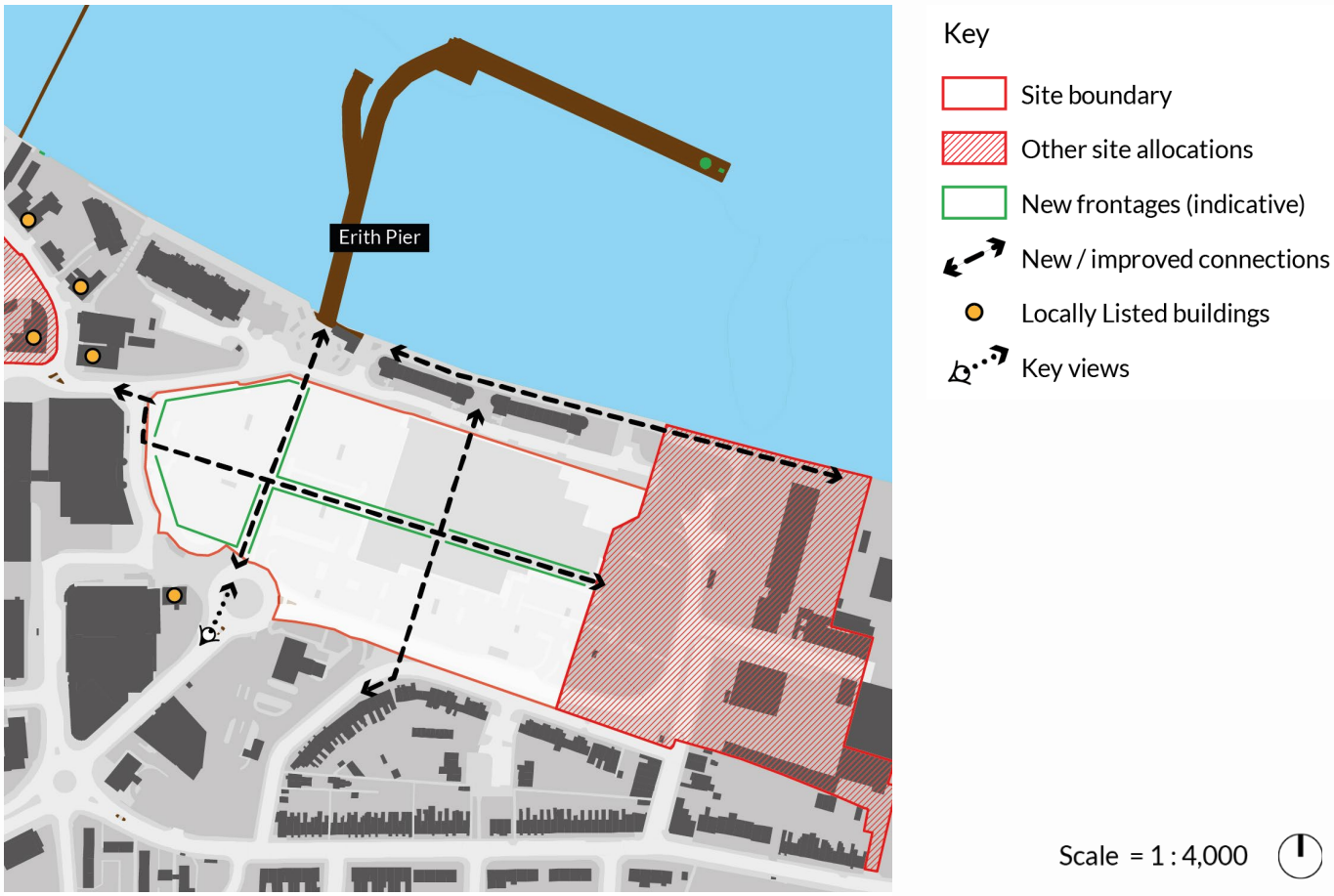


Figure 30: Morrisons Erith site map and details

Site and surroundings

Morrisons Erith adjoins **ERI04: Erith Riverside** to the east; and is situated within the Erith town centre boundary. It is characterised by low density commercial development; a supermarket served by a large car park with vehicular access to the public highway along the southern boundary. Except for two tower blocks further to the west, the surrounding building heights are predominantly 2-4 storeys. Key riverside features to the north include two blocks of four-storey residential properties overlooking the river, and Erith Pier adjoining Pier Square public space. Erith station is approximately 820m to the east of the site, and there are several town centre bus stops within the immediate vicinity.

Opportunities and constraints

Opportunities	Constraints
Reinstating Wheatley Terrace Road as a key east-west route through the site with **ERI04 Erith Riverside**	Work with the Council and TfL to safeguard a potential Bus Rapid Transit route through the site with **ERI04 Erith Riverside**
Introducing a large number of residential units into a town centre.	Existing residential to the north and south could serve as a potential constraint on height and character.
Integrating the development with Pier Square, a key public realm focal point.	Need to re-provide significant retail capacity in a more urban, pedestrian-friendly format.
Incorporating open space within the development to address deficiency of open space within the area.	Northern parts of the site fall within Flood Zone 3.
Providing opportunities for views and connections to the River Thames including improvements to Erith Pier	Major surface water sewer runs to the west of the allocation.
Providing an improved vehicular route from the town centre, improving the current configuration which brings vehicles through the car park.	Existing parking provision provides a key source of parking for the town centre and may need to be re-provided.
Maximise opportunities to support the wildlife function the River Thames.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Riverside development not on the riverside: The site is located close to the River Thames, but the river frontage is blocked by the adjacent Wharfside Close development of 3 and 4 storey townhouses and blocks. Block heights, layout, and orientation should be designed to provide views through and past Wharfside Close to maximise outlook on to the River Thames, without causing adverse impacts to amenity such as daylight.

Define Pier Square: The adjacent public realm at Pier Square has been identified as a key focal point within the town and will enjoy extensive public realm improvements and investment creating a vibrant public

space. The development should help to define this public space through built form and uses. Frontage facing Pier Square should be designed to frame the space and ground floor uses should create activity. A pedestrian-friendly north/south route should provide a physical and visual connection.

Provide upgrades to Erith Pier: the pier is within the town centre boundary but will need improvements to the structure to allow town centre uses on the pier, which will contribute to the realisation of Pier Square as a vibrant public space.

Site as urban extension: Such a large site within the town centre and surrounded by fragmented sites presents the opportunity to be ambitious, creating a new piece of town with a new character. The extent of this opportunity should also be considered in terms of the potential across the site and the neighbouring **ERI05: Erith Riverside.**

Layout, heights and massing: The western edge of the site should have a strong placemaking ambition fronting Pier Square, replacing the existing car parking with an attractive frontage that establishes a strong relationship to the street. This block offers the potential to provide a large format retail offer in a streets-based development. A variety of building types should be used to create transitions in scale across streets and to address the patchwork of uses and existing context surrounding the site.

Uses: The site should be largely residential but with significant quantum of town centre uses on lower floors including the provision of a large format retail store on the western edge of the site fronting Pier Square. Within the core of the site, residential uses will be appropriate at ground floor, but fenestration and other design choices should create a sense of activity and reinforce the movement hierarchy.

Streets: The very large size of the site and its current lack of well-defined sense of place and setting offer the opportunity to create a 'new piece of town'. A new series of routes across and within the site should create a clear movement hierarchy that facilitates a variety of flows throughout the site as well as connections towards the River Thames and towards the town centre. A number of existing and historical routes should be reinstated, including Wheatley Terrace Road as the key east-west route continuing through the neighbouring **ERI04: Erith Riverside**. North/south routes should also be created, to host a block structure and enhance the permeability of the site. One of these north/south routes should enhance the existing pedestrian route that connects to Pier Square and the Erith Pier.

The site currently accommodates vehicular traffic moving from Bexley Road/Wharfside Close to James Watt Way via the car park. Working with the Highway Authority, the development must re-route that traffic, either along the extended Wheatley Terrace Road or outside the site, potentially from Bexley Road/Wharfside Close along Colebrook Street directly to the roundabout with James Watt Way.

Parking provision: The site is currently largely comprised of surface car parking which is an important parking resource not only for the store but also for the town centre, but which currently has a large negative visual impact on the area. The functional and visual impact of any re-provided parking should be minimised, for example by incorporating within the new block structure.

Future-proof against flood risk: Manage flood risk wherever possible, for example by locating living accommodation above the maximum future flood level. Utilise SUDS to mitigate flood risk.

Partnership working: Work in partnership with **ERI04: Erith Riverside** to develop a consistency of character and a rational block structure that can straddle site boundaries. The movement network should seamlessly cross both sites, including an extended Wheatley Terrace Road. The sites should not come forward separately unless master planning or other work is presented to ensure that doing so would not represent piecemeal development.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
3.190	2.393 (assumes residential above ground floor)	2 to 3	1, 2 and 3a	Single ownership	Retail with car parking	District town centre

Table 28: Morrisons Erith site summary information

Other guidance

Parking: The development must be informed by a parking demand survey looking at demand across the town centre and the role that the site can play in meeting demand. The appropriate level of car parking should be informed through discussion with the Highway Authority.

Archaeology: The site falls within a Tier 3 Archaeological Priority Area, but does not exceed 2ha, so the site would be viewed as a Major development within the Archaeological risk model. The site is assessed as a medium risk on the GLAAS model. An application would need to be accompanied by an Archaeological Assessment/Statement of Archaeological Significance.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS39. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: The site falls within an area identified as being deficient in access to open space. Refer to Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets. Also refer to Bexley SINC Report: River Thames SINC Ref.M031, strategic green wildlife corridor network map, corridor 9 and 11. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

Bexleyheath sustainable development locations

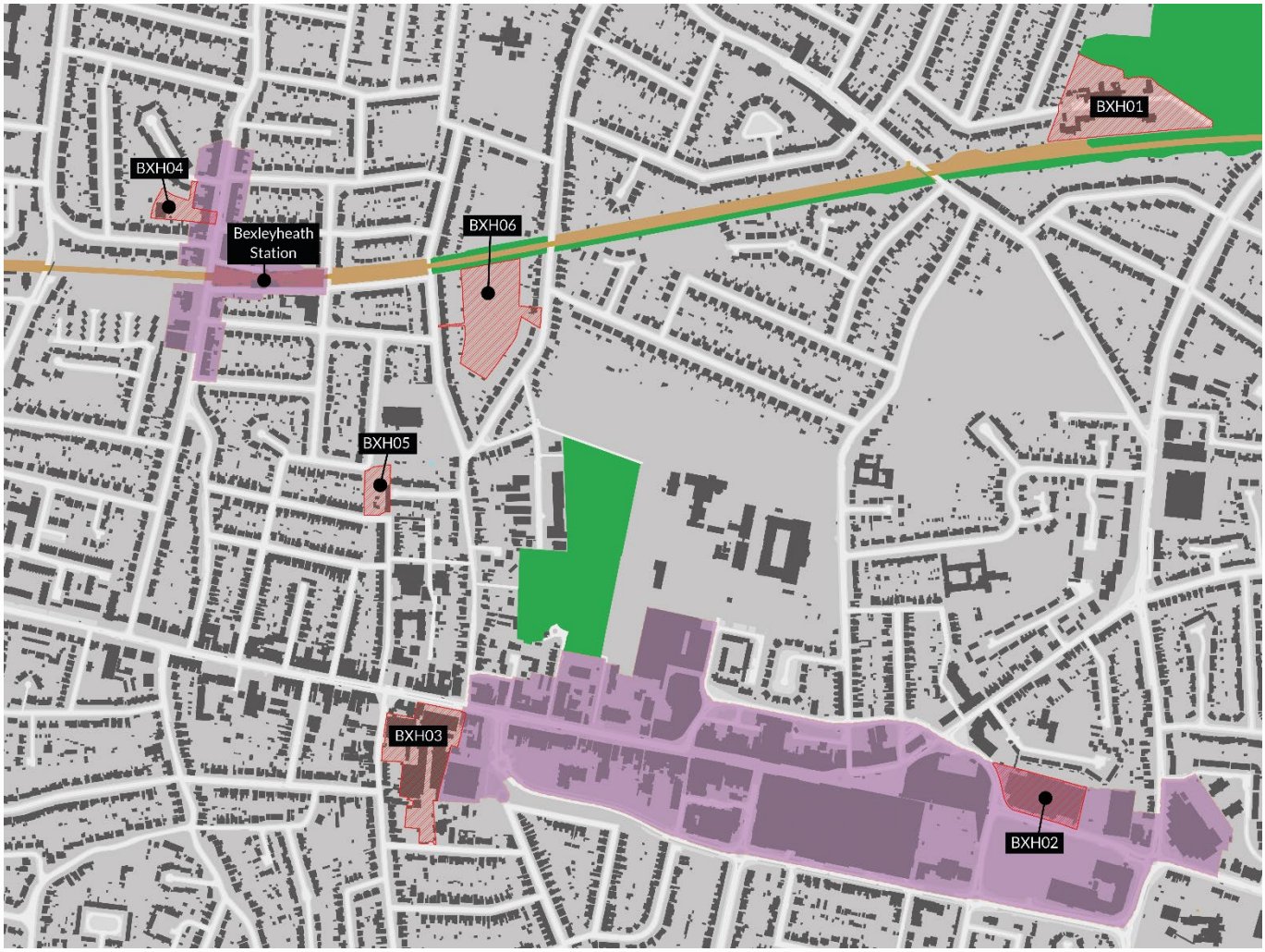
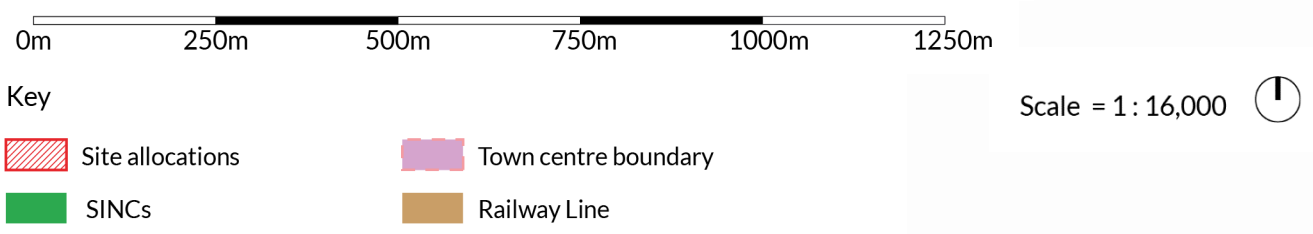


Figure 31: Bexleyheath town centre, railway station, local centre and surrounding areas



Site allocation	Site name
SA15	BXH01 Former Bexley CCG Offices
SA16	BXH02 Bexleyheath Town Centre East
SA17	BXH03 EDF Energy
SA18	BXH04 Buildbase Bexleyheath
SA19	BXH05 Pepper's Builders Merchants
SA20	BXH06 Land behind Belvedere Road

Table 29: List of site allocations in the Bexleyheath sustainable development locations

BXH01 Former Bexley CCG offices

Erith Road, Barnehurst

SA15 BXH01 Former Bexley CCG Offices

Land use and capacity

1. This site is allocated for primarily residential development. The design-led approach for optimising site capacity suggests that a minimum of 182 new homes can be achieved on this site along with the re-provision of the existing GP surgery.

Development approach

2. Development of this site should enhance the area. As well as meeting other policy requirements, proposals should retain and convert the locally listed former Bexley Maternity Hospital. A landscaped buffer should be created between the development and the ancient woodland and SINC to the north.



Figure 32: Former Bexley CCG Offices site map and details

Site and surroundings

This is a brownfield site containing a GP practice and residential care home, along with a number of vacant buildings formerly related to health provision, arranged around a former maternity hospital. This visually secluded site is bounded by residential back gardens to the west; Bexleyheath rail line to the south; and,

Bursted Wood Open Space, an ancient woodland and Site of Importance for Nature Conservation (SINC) to the north and east. The rail line is also part of a SINC. The site is within walking distance to Barnehurst station.

Opportunities and constraints

Opportunities	Constraints
Improving the setting of the former Bexley Maternity Hospital (a locally listed building) and incorporating the building to anchor the development and provide a focal point.	A 15m ecological buffer will be required along the site's northern boundary to protect Bursted Woods, a borough grade II SINC and ancient woodland. A smaller ecological buffer will also be required along the site's southern boundary which adjoins another a grade II SINC.
Improving access to the ancient woodland of Bursted Woods and responding positively to this significant green asset, drawing upon its character to inform development.	The site contains a GP surgery. This use is not considered to be surplus to requirements and its loss will be resisted. It will therefore need to be reincorporated as part of redeveloping the site.
Creating a distinctive character across the site with the cover provided by the woodland and train line reducing the development's impact on existing suburban form.	Due to the proximity and orientation of neighbouring dwellings and the former Maternity hospital, the northern part of the site may be limited in terms of height.
Intensifying an underutilised site that has access to good levels of public transport provision and shops.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. Given the size of the site and character of the area, it is considered that the minimum capacity specified in the Policy will be similar to the optimum capacity.

Streets and public spaces: Retain the current east to west street alignment that integrates the site with Lavernock Road, and which provides a long view of the ancient woodland at the end of the street vista. Create a high-quality public space in front of the former Bexley Maternity Hospital which responds in its width and length to the dimensions of the locally listed building and which reinforces it as a focal point within the development. Create smaller secondary street spaces that run in a north/south alignment which lead towards the ancient woodland and which are terminated to the south by built form instead of the railway line. Ensure that street spaces are well defined by built form and that parking is not a dominant street quality.

Heritage: The locally listed former Maternity Hospital should anchor the development, in terms of its visual prominence and informing the broader design aesthetic across the site. The building itself should be retained and converted into a block of flats. The layout of the site should be designed with regard to the focal building, particularly in terms of using the heights, massing, and orientation of new blocks closest to the locally listed building to frame the heritage asset.

Blocks and building heights: Convert the former Maternity Hospital into a block of flats. Explore ways of sympathetically integrating new development with the former Hospital building, such as by adding a set of north/south running wings that would reinforce its formal symmetrical qualities and create an internal

courtyard that could look onto the ancient woodland. Use a finer grain of development with lower heights between the former Hospital building and the established residential areas to the north-east. Explore ways of delivering a significant amount of development across the more secluded southern half of the site, for instance by using north/south 'finger block' elements up to five storeys in height with lower east/west interlinking blocks fronting the east/west route.

Uses: Deliver residential accommodation across the site including within the former Bexley Maternity Hospital. The GP surgery should be retained and re-provided on the ground floor as part of a mixed-use block. Consider locating this facility close to an entrance to the site.

Integrate development with green infrastructure: To the north of the site, a buffer zone of at least 15m, consisting of semi-natural habitats, will be needed to protect ancient woodland and support the ecological functioning of this SINC. The design also needs to incorporate a tree lined ecological buffer zone along the southern boundary to support, restore and enhance the wildlife function of the strategic green wildlife corridor running along the rail side.

Site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
1.850	3	1	Council ownership	GP surgery; vacant buildings	Primarily residential area

Table 30: Former Bexley CCG Offices site summary information

Other guidance

Heritage: The former Bexley Maternity Hospital is Locally Listed. Development would be required to have due regard to the setting of this building by illustrating sensitivity to this designated heritage asset.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS12. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets including ancient woodland. The site is adjacent to and within 500m of Ancient Woodland. Refer to Bexley SINC Report: Bursted Wood SINC Ref.BxBII05 and Rail sides from Bexleyheath to Slade Green Triangle SINC Ref.BxBII14; and strategic green wildlife corridor 7. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: Rail noise affects parts of the site. Refer to Development Plan policies.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BXH02 Bexleyheath Town Centre East

Broadway, Bexleyheath

SA16 BXH02 Bexleyheath Town Centre East

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development. The design-led approach for optimising site capacity suggests that a minimum of 134 new homes can be achieved on this site along with, as a minimum, the re-provision of the existing floor space for town centre uses. Including leisure uses at ground and lower floors.

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, town centre parking should be provided at an appropriate amount and designed to minimise its functional and visual impact.



Figure 33: Bexleyheath Town Centre East site map and details

Site and surroundings

This is a medium sized brownfield site (0.28 ha) that is located at the prominent junction of Arnsburg Way and Broadway within Bexleyheath Town Centre. It is occupied by a large 'big box' cinema development as well as other leisure uses and a car park. Whilst these uses make a significant contribution to the town

centre's leisure offer, the building itself is dated, relates awkwardly to the street, and has a lot of blank façade. Opposite the site, the Eastside Quarter development is emerging as a new mixed-use quarter with residential accommodation above town centre uses. Bexleyheath's bus hub is within walking distance.

Opportunities and constraints

Opportunities	Constraints
Creating a residential-led mixed use development in Bexleyheath town centre that is within walking distance to Bexleyheath bus hub and in one of the best-connected areas of the borough.	Residential development backs onto the site's northern boundary and could suffer from overlooking and overshadowing.
Helping to draw the town centre eastwards along Broadway towards the Civic Offices, creating a more positive east-west connection and furthering the improvements made by the neighbouring Eastside Quarter development.	The site to the south is currently under construction, with height purposely employed to provide a visible landmark. Development of this site will be expected to be less high than the neighbouring development so that Eastside Quarter can serve as a point of emphasis.
Enhancing and activating a prominent corner within the town centre and mending the urban realm by incorporating the small pieces of undeveloped land alongside Arnsberg Way.	The site is located within a Tier 2 Archaeological Priority Area (due to the proximity of the site to the old Roman road of Watling Street).
	The site suffers higher levels of noise and poorer areas of air quality to the south and west of the site.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Blocks and building heights: Establish a consistent building line along Arnsberg Way and Broadway. Use architecture and massing to create a visual and functional emphasis at the corner and a vista at the end of Arnsberg Way that helps people navigate themselves into the town centre. Massing should avoid excessive overshadowing of residential gardens to the north. Use massing to create a perimeter block with a clear separation between 'shoulder height' and taller elements up to 8 storeys which sit within the context of the Eastside Quarter development. Buildings should be designed to avoid prejudicing future development to the east of the site.

Uses and streets: Provide town centre uses at ground and lower floors to create a strong connection between internal commercial spaces and the street. Incorporate residential accommodation above and explore ways of creating a transition between the street and residential entrances to mitigate the impact of air pollution and noise levels upon communal residential entrance lobbies.

Parking provision: Redevelopment should optimise the site including by redeveloping the multi-storey car park as a mixed-use building, potentially incorporating parking within the new block. Any solution to provide required amounts of car parking should minimise the functional and visual impact of the car parking, and in particular proposals should avoid using large portions of the site as surface car parking.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
0.810	0.608 (assumes residential on upper levels; leisure uses will likely need more than the ground floor)	5	1	Multiple ownership, including Council ownership	Leisure; car park	Major town centre

Table 31: Bexleyheath Town Centre East site summary information

Other guidance

Car parking: The development must be informed by a parking demand survey looking at demand across the town centre and the role that the site can play in meeting demand. The appropriate level of car parking should be informed through discussion with the Highway Authority.

Archaeology: The site is located within a Tier 2 Archaeological Priority Area (due to the proximity of the site to the old Roman road of Watling Street). As the site is a Tier 2 APA and over 0.5 ha, the site is assessed as medium risk on the GLAAS model. An application would be required to be accompanied by an Archaeological Assessment/Statement of Archaeological Significance.

Heritage: There is a locally listed structure to the south of the site, on Watling Street.

Risk of flooding: Refer to Bexley SFRA Level 1 Report. This is a Major development. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: The site falls within an area identified as being deficient in access to open space. Refer to Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: An Ecological Impact Assessment will be required to inform design. Refer to Bexley Green Infrastructure Study Chapter 10.

Environmental quality: Road noise affects parts of the site, as do high levels of NOx emissions from vehicles. Refer to Development Plan policies, and the local plan transport assessment Chapter 19 on Air Quality

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BXH03 EDF Energy

Heath House, Broadway, Bexleyheath

SA17 BXH03 EDF Energy

Land use and capacity

1. This site is allocated for primarily residential development. The design-led approach for optimising site capacity suggests that a minimum of 200 new homes can be achieved on this site along with some commercial uses fronting the Broadway.

Development approach

2. Development of this site should enhance the area. As well as meeting other policy requirements, proposals should introduce a legible internal movement network.



Figure 34: EDF Energy site map and details

Site and surroundings

This is large brownfield site occupied by office buildings; with storage, yard space and car parking behind. The site effectively occupies the carved-out centre of a residential block, connected to the Lion Road neighbourhood parade and Bexleyheath town centre, the edge of which abuts the eastern boundary of the site.

Opportunities and constraints

Opportunities	Constraints
Creating better permeability. There is frontage on to three different streets, and potential access onto a fourth.	The site falls within a critical drainage area, where surface water flooding is prevalent.
Improving the setting of the listed building neighbouring the site and providing active frontage onto the street.	Mature tree on the northern edge of the site will need to be retained.
Providing residential accommodation within walking distance to Bexleyheath town centre, the Bexleyheath bus hub, Bexleyheath station and Lion Road neighbourhood centre.	Residential neighbours to the south of the site with potential overlooking issues.
Reducing flood risk by improving surface water runoff.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Large residential opportunity within Bexleyheath: The site's location adjacent to Bexleyheath town centre and on the town's main road make it an appropriate opportunity for higher density residential development. The southern part of the site is comprised of surface vehicle parking, which presents an opportunity to optimise the land use through in-fill of this car parking space with residential development.

Layout: The site has potential frontage on to four different streets and therefore must play an important placemaking role. The primary frontage should be along the Broadway, the town's main street, where the development should provide a much stronger presence than the current building. The edge fronting the Broadway should include active frontages at ground level, bring forward the development to continue the building line established by neighbouring buildings (whilst respecting the mature tree), and consider heights up to six storeys. The secondary frontages at Lion Road and Heathfield Road should respect the amenity of existing residential properties.

Streets: The site should have strong relationships with the adjacent streets, particularly the Broadway and Lion Road. Within the site, new routes should be created to form a movement hierarchy. The main vehicular routes should be formed by extending existing access points into the site, including an east/west route extending from the current entrance from Lion Road through to the road that provides access to the Bowling Alley multi-storey car park (the level change will need to be addressed), and a north/south route extending from the current entrance from Heathfield Road into the site, though not crossing through to the northern edge of the site. Tertiary routes can be created off of these two main routes to provide access to the blocks. Although the site should be 'opened up', with the east/west route in particular enhancing permeability, the movement hierarchy should reinforce the existing highway network surrounding the site as the main routes, with the internal routes primarily providing access.

Blocks and heights: The large size of the site provides opportunities to use differentiations in heights and typologies to optimise development potential, reinforce the movement hierarchy, frame public realm, and

create visual interest. Taller buildings are more appropriate towards the north of the site, whilst heights should be reduced towards the south and near the existing residential properties along Lion Road. Although six storey buildings are likely the limit on the Broadway frontage, blocks to the rear could extend to up to eight storeys before reducing in height towards the south. Similarly, linear and courtyard blocks are more appropriate towards the north, whilst towards the south typologies should transition to the surrounding lower density residential area, potentially including the use of stacked maisonettes giving way to terraced housing. The blocks must be carefully arranged to avoid adverse impacts on the adjacent locally listed buildings and should seek to frame these buildings positively.

Uses: The site should be largely residential. Although outside of the town centre boundary, limited commercial uses could be employed on the ground floor to create an active frontage along the Broadway, reflecting that route's role as the high street within Bexleyheath. The remainder of the site should be residential.

Partnership working: Partnership working with surrounding landowners will be necessary to secure access arrangements, both for construction and use purposes, including for example the road that provides access to the Bowling Alley multi-storey car park.

Site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
1.482	3 to 5	1	Single ownership	Utilities infrastructure	Primarily residential area

Table 32: EDF Energy site summary information

Other guidance

Archaeology: The majority of the site is located within a Tier 2 Archaeological Priority Area (due to the proximity of the site to the old Roman road of Watling Street). An application would be required to be accompanied by an Archaeological Assessment/Statement of Archaeological Significance.

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS17. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Nature and open space deficiency: The site is located within an area that is deficient in both access to nature and open space. Refer to Bexley Green Infrastructure Study, including Chapters 6 and 10.

Biodiversity: This is a Major development. An Ecological Impact Assessment will be required to inform design. Refer to Bexley Green Infrastructure Study Chapter 10.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: Road noise and high levels of NOx emissions from vehicles affect the northern part of the site. Refer to Development Plan policies, and the local plan transport assessment Chapter 19 on Air Quality.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BXH04 Buildbase Bexleyheath

Pickford Lane, Bexleyheath

SA18 BXH04 Buildbase Bexleyheath

Land use and capacity

1. This site is allocated for primarily residential development. The design-led approach for optimising site capacity suggests that a minimum of 32 new homes can be achieved on this site along with commercial uses fronting Pickford Lane.

Development approach

2. Development of this site should enhance the area, as well as meeting all other policy requirements.



Figure 35: Buildbase Bexleyheath site map and details

Site and surroundings

The easternmost portion of this brownfield site is within the Bexleyheath station town centre boundary, typically made up of 2 to 3 storey buildings; the north, south and west of the site is surrounded by residential buildings of 1 to 2 storeys high. Most of the site consists of a large builder's yard and there is a large warehouse unit on the western part of the site. Pickford Lane itself serves as a busy bus corridor providing links between the rail station to the south-east of the site and Bexleyheath town centre. Bus stops also offer frequent bus links to the future Elizabeth Line services at Abbey Wood station.

Opportunities and constraints

Opportunities	Constraints
Accommodating residential development on a back-land plot that is adjacent to Bexleyheath local centre and within walking distance of Bexleyheath station.	Neighbouring residential properties are in close proximity which may raise issues of overlooking/overshadowing.
Improving amenity for immediate neighbours to the north and south by reducing hardstanding, adding soft landscaping and removing activity associated with the use of the site as a builder's yard.	The portion of the site fronting Pickford Lane which is within the town centre boundary will need to be retained for town centre uses at ground floor level.
Reducing the dominance of parked vehicles along Pickford Road by reorganising the way in which the internal shop space relates to the street.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. Given the size of the site and character of the area, it is considered that the minimum capacity specified in the Policy will be similar to the optimum capacity.

Uses: Retain town centre uses fronting onto Pickford Lane, introducing residential units behind and above.

Street space: Consider the creation of an east to west running mews street that could terminate with a vista of mature trees.

Buildings and heights: Use a terraced typology to create a fine grain of development with heights up to 3 storeys. Explore ways of softening building massing along the site's southern boundary and ways of visually integrating the development into its surroundings through its roofscape.

Trees: Utilise the mature tree coverage along the site's western boundary to minimise potential overlooking and explore ways of incorporating amenity space into the development that could incorporate this tree coverage. Provide private amenity space between built form and site boundaries to allow for a soft buffer to be established between neighbouring properties.

Site area (hectares)	Residential site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
0.302	0.226	4	1	Single ownership	Builder's merchants	Primarily residential area; local town centre

Table 33: Buildbase Bexleyheath site summary information

Other guidance

Risk of flooding: Refer to Bexley SFRA Level 1. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Open space deficiency: The site falls within an area identified as being deficient in access to open space. Refer to Bexley Green Infrastructure Study, including Chapters 6.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets. Refer to Bexley SINC Report: strategic green wildlife corridor 7. An Ecological Impact Assessment will be required to inform design.

Environmental quality: Air pollution from vehicles affects parts of the site. Refer to Development Plan policies, and the local plan transport assessment Chapter 10 on Air Quality.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BXH05: Peppers Builders Merchants

Rowan Road, Bexleyheath

SA19 BXH05 Peppers Builders Merchants

Land use and capacity

1. This site is allocated for primarily residential development. The design-led approach for optimising site capacity suggests that a minimum of 29 new homes can be achieved on this site.

Development approach

2. Development of this site should enhance the area. As well as meeting all other policy requirements, proposals should create a new street across the site between Rowan Road and Stratton Road/Harlington Road.

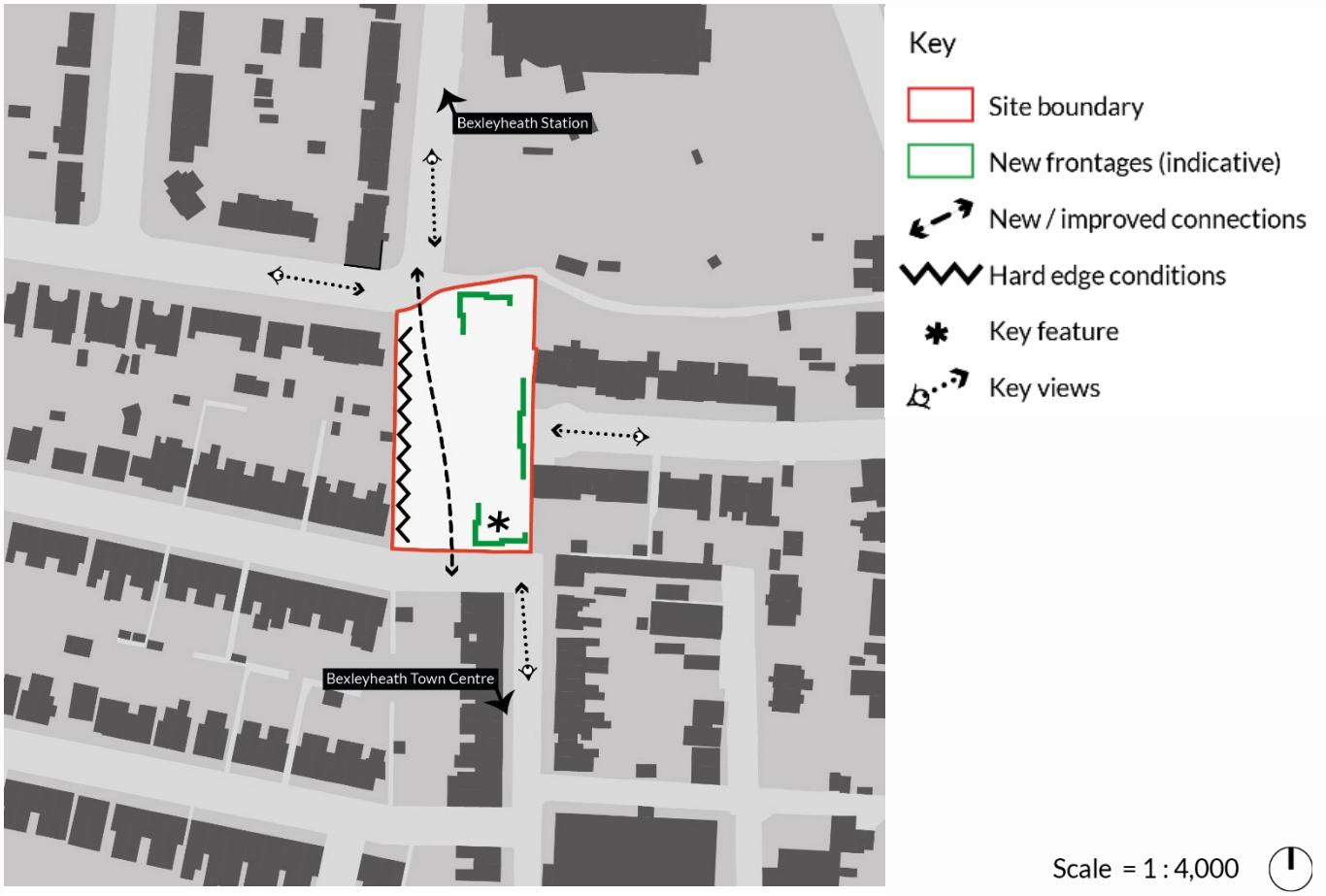


Figure 36: Peppers Builders Merchants site map and details

Site and surroundings

Peppers is a small brownfield site (0.28 ha) that fronts and gains access from Rowan Road, a well frequented route between Bexleyheath town centre and Bexleyheath station. The site is within a primarily residential area and forms part of three predominant low-rise residential street scenes, though properties along West Street appear taller due to gabled fronts facing the street. A primary school sits to the north of the site.

Opportunities and constraints

Opportunities	Constraints
Intensifying the site and delivering residential development near to Bexleyheath station and local centre, and Lion Road neighbourhood centre.	The site forms part of several street scenes. Whilst West Street has a larger variety of building types, views along Bynon Avenue and Stratton Road capture development that has a consistency of massing and height.
Facilitating new connections between surrounding streets and increasing local permeability between Broadway and Bexleyheath station.	Residential plots neighbour the site along its eastern and western boundaries. Development will need to ensure adequate levels of privacy and daylight are maintained to neighbouring properties.
Responding positively to long views of the site and reinforcing the presence of a new local route.	
Creating active street frontages within the street scenes of Rowan Road and Bynon Avenue.	
Responding to the proximity of the adjacent school by incorporating the potential for street-based play into the street scene.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. Given the size of the site and character of the area, it is considered that the minimum capacity specified in the Policy will be similar to the optimum capacity.

Streets: Create a new street across the site between Rowan Road to Stratton Road which is well defined by active building frontages. Consider creating a 'slow street' that would inhibit vehicular through movements.

Buildings and heights: Consider using a combination of building typologies with shallow footprints that would allow for a building line to define both sides of the new street. Use architecture and massing to create a visual emphasis at the corner of West Street and Rowan Road to help with visual wayfinding when approach the site from the town centre. Consider the use of a flatted block up to 4 storeys along the site's eastern boundary with a core that could also front on to Bynon Avenue. Consider the use of a row of terraces along the site's western edge that could echo a sense of vertical rhythm found in surrounding development.

Uses: Explore ways of incorporating opportunities for play within the street space and perhaps at the junction of Harlington Road and Stratton Road.

Site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
0.282	4	1	Single ownership	Builder's merchants	Primarily residential area

Table 34: Peppers Builders Merchants site summary information

Other guidance

Risk of flooding: Refer to Bexley SFRA Level 1. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Biodiversity: An Ecological Impact Assessment will be required to inform design. Refer to Bexley Green Infrastructure Study Chapter 10.

Other: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

BXH06: Land behind Belvedere Road

Belvedere Road, Bexleyheath

SA20 BXH06 Land behind Belvedere Road

Land use and capacity

1. This site is allocated for primarily residential development with green, open spaces. The design-led approach for optimising site capacity suggests that a minimum of 85 new homes can be achieved on this site

Development approach

2. Development of this site should enhance the area. As well as meeting other policy requirements, proposals should create a new route between Church Road and Belvedere Road. Proposals should also provide a new green open space of at least 0.4 hectares, and an enhanced ecological buffer along the railway on the northern edge of the site.

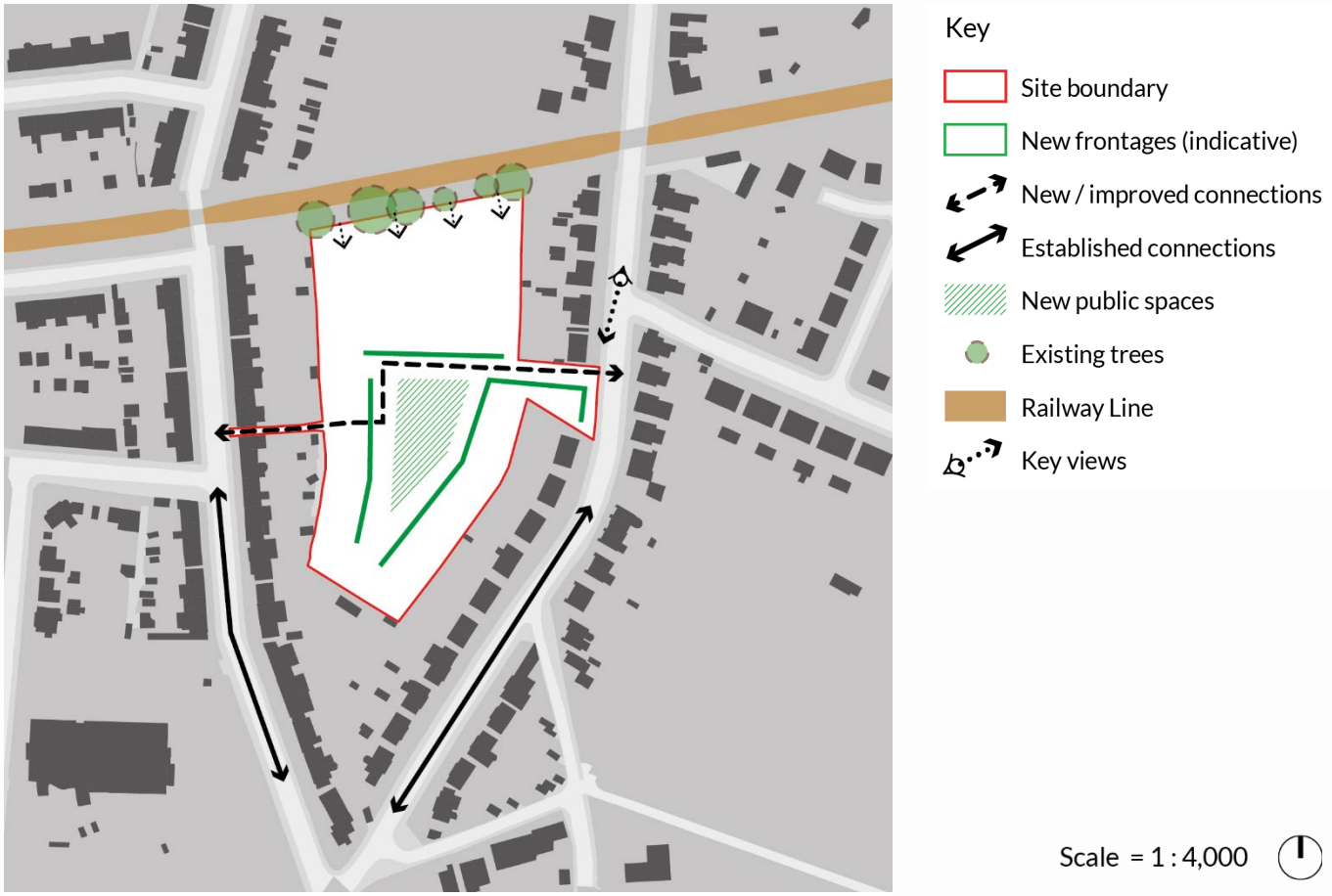


Figure 37: Land behind Belvedere Road site map and details

Site and surroundings

This is a large back-land irregularly shaped site (1.34 ha) that sits to the south of the Bexleyheath railway line. It is a former school playing field that has been listed as vacant on the Council's Asset Register for more than ten years.

It is surrounded on three sides by low-rise residential development and is bounded along its northern boundary by an ecological corridor that follows the railway line. Bexleyheath railway station and its local centre is within walking distance to the west, with Bexleyheath town centre to the south.

Opportunities and constraints

Opportunities	Constraints
Optimising a vacant back-land plot, providing residential development within walking distance of Bexleyheath Station and Local Centre and in an area with moderate levels of public transport provision.	The site has a single point of access and egress from Belvedere Road. This arrangement would make walking and cycling journeys longer if travelling towards Bexleyheath station.
Increasing levels of permeability across the local area and shortening walking distances to surrounding amenities.	The railway line is a source of intermittent noise along the site's northern boundary.
Enhancing the biodiversity corridor which runs along the railway edge by expanding this green asset into the site.	Established residential plots back onto much of the site creating large stretches of inactive garden boundary fencing.
Incorporating open space provision to address the area's open space deficiency.	

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. Given the size of the site and character of the area, it is considered that the minimum capacity specified in the Policy will be similar to the optimum capacity.

Streets and public spaces: Consider creating a communal green within the southern half of the site which is protected from the elements by development and which is well defined by built form with active frontages. Establish a cross route from east to west for pedestrians and cyclists by creating a link through adjacent residential alleyway to Church Road. Improve access arrangements onto Belvedere Road for vehicles, including securing speed reduction measures along Belvedere Road, such as raised table junctions and speed cushions.

Blocks, buildings and heights: Consider creating a perimeter apartment block up to 4 storeys across the northern half of the site to make good use of this area's regular proportions and less sensitive amenity boundary next to the railway, whilst ensuring the green corridor along the railway is enhanced. Consider using a finer grain of development along site edges and fronting communal green spaces.

Uses: Provide residential development across the site and create an ecological buffer along the railway edge that could be brought into the development and incorporated into amenity space for the perimeter flatted blocks. Approximately one-third of the site should be provided as a green open space to address the area's open space deficiency.

Site area (hectares)	Residential site area (hectares) excluding open space	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
1.344	0.944	2 to 3	1	Council ownership	Vacant	Primarily residential area

Table 35: Land behind Belvedere Road site summary information

Other guidance

Risk of flooding: Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID MS54. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design.

Nature and open space deficiency: The site is located within an area that is deficient in both access to nature and open space. A new open space around a third of the site's area could help alleviate these deficiencies. Refer to Bexley Green Infrastructure Study, including Chapters 6 and 10.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets. Refer to Bexley SINC Report: rail sides SINC Ref.BxBII14, and strategic green wildlife corridor 7. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: Rail noise affects parts of the site. Refer to Development Plan policies.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

Crayford sustainable development location



Table 36: Town centre, railway station and surrounding area

0m 200m 400m 600m 800m 1000m

Key

Site allocations

Town centre boundary

Waterways

SINCs

Railway Line

Scale = 1 : 8,000

Site allocation	Site name
SA21	CRA01 Former Electrobase/Wheatsheaf Works
SA22	CRA02 Tower Retail Park
SA23	CRA03 Sainsbury's Crayford

Table 37: List of site allocations in the Crayford sustainable development location

CRA01 Former Electrobase/Wheatsheaf Works

Maxim Road, Crayford

SA21 CRA01 Former Electrobase/Wheatsheaf Works

Land use, capacity and phasing

1. This site is allocated for primarily residential development. The design-led approach for optimising site capacity suggests that a minimum of 300 new homes can be achieved on this site and the creation of an enhanced riverside environment along the River Cray.

Development approach

2. Development of the site should transform the area by introducing a residential neighbourhood, with frontages set well back from the River Cray, creating a new riverside walk connecting the town centre with Crayford Meadows (also known as Crayford Rough), and introducing frontages along Roman Way. Proposals should also provide connections between the areas to the north of the site into the town centre and to the station. The development should look to enhance the area's natural assets, particularly the River Cray and Crayford Meadows.

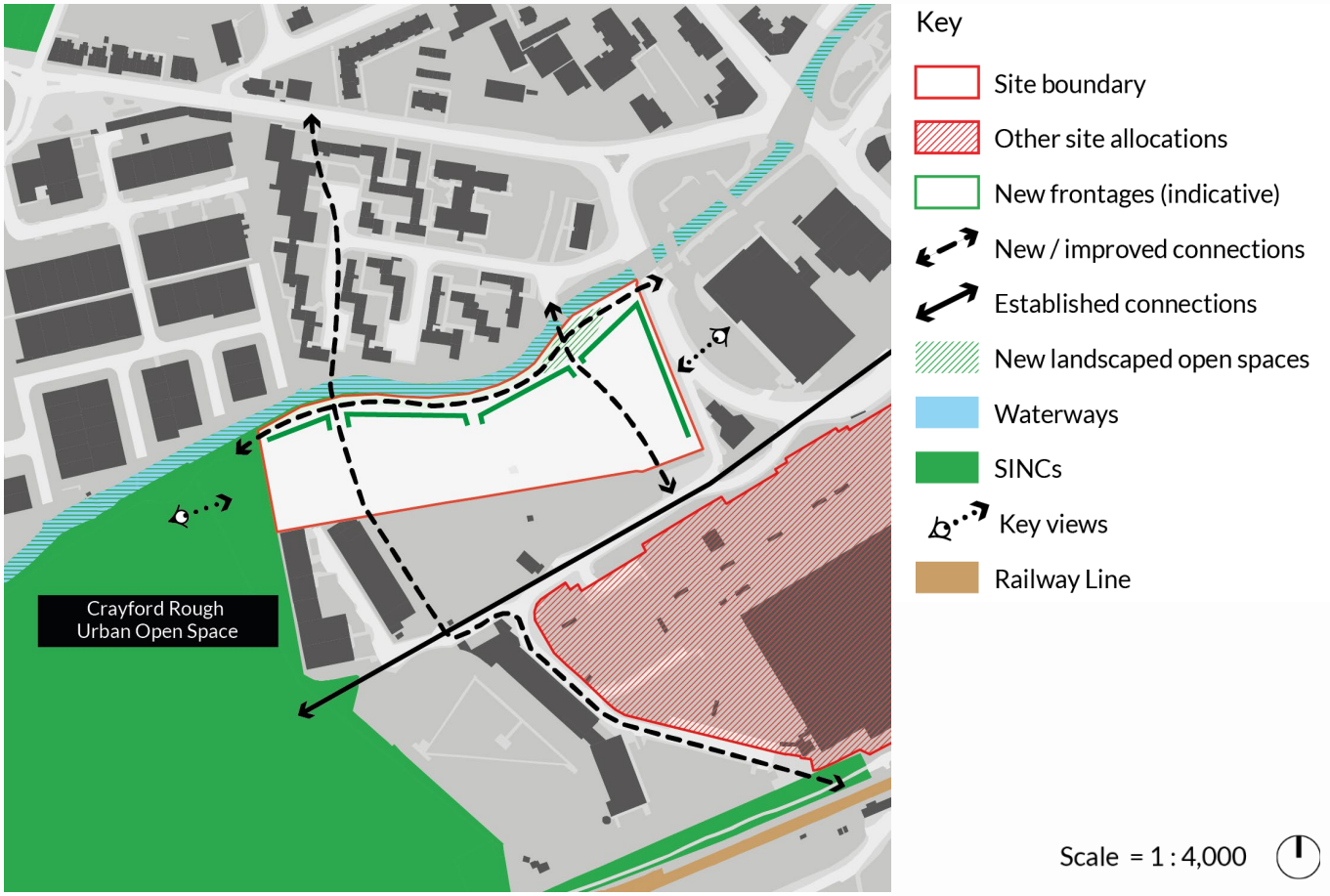


Figure 38: Former Electrobase/Wheatsheaf Works site map and details



Site and surroundings

This medium-sized site (1.74ha) is located immediately outside the boundary of Crayford district town centre. This brownfield site was formerly industrial but has since been cleared and is now comprised of hardstanding. Although near to both the town centre and Crayford station, the site is surrounded by built and natural barriers which lend it a sense of isolation. One such barrier is the busy A207 (Roman Way)/Stadium Way part of Crayford's one-way system, which is dominated by fast-moving vehicles and offers no facility for pedestrian crossing. The River Cray is another barrier, cutting the site off from the residential neighbourhood to the north, although the long river frontage offers opportunities for quality outlook and improved river access, as well as being a significant ecological asset.

Similarly, Crayford Meadows (also known as Crayford Rough) to the west is designated Green Belt and Urban Open Space, which provides high-quality natural amenity, a significant ecological asset, as well as a link to the Grade I listed Hall Place and its gardens. The industrial site to the south is currently in uses that are not highly polluting but do involve significant vehicle movement causing potential noise issues.

Opportunities and constraints

Opportunities	Constraints
Developing a large site that delivers a significant amount of homes within walking distance of Crayford station and town centre, with access to moderate levels public transport provision.	Access to the site is given via Maxim Road with a bridge crossing over the River Cray. This single point of access is a constraint for vehicular traffic.
Delivering development that fronts onto the River Cray, enhancing the ecological value of the riverbank and creating a welcoming route between the town centre and Crayford Meadows.	The adjacent Crayford Meadows is designated Green Belt, Urban Open Space and metropolitan SINC, indicating its high amenity value and its regional ecological significance.
Opening the River Wansunt culverted watercourse to 'daylight' the river and improve the amenity of the area.	An offset from any built structure to the River Cray, and River Wansunt culvert should be observed, in line with the detailed site assessment in Appendix B of the Bexley SFRA Level 2.
Providing frontage along Roman Way, adding definition and a sense of enclosure to a street space currently defined by the presence of vehicular traffic.	This site is located predominantly in flood zone 3a. The River Cray was relocated in the past further up the side of the natural valley. As such it is situated at a higher level than much of Crayford town centre. This means that if water spills over the right bank it will collect at the bottom of the valley, potentially resulting in deep, rapid onset flooding.
Increasing local permeability between London Road and Stadium Way by establishing crossing points over the River Cray.	The industrial land to the south could harm amenity particularly in terms of noise caused by vehicular movement.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. Given the size of the site and character of the area, it is considered that the minimum capacity specified in the Policy will be similar to the optimum capacity.

Integrate development with green and blue infrastructure: The design should be anchored by the two high-quality natural assets adjacent to the site; the River Cray and Crayford Meadows. Block heights, layout, and orientation should maximise access to and outlook onto this green and blue infrastructure. The site offers a long river frontage which should be enhanced through development, including enhancement of riverside habitat for wildlife and a new green, publicly accessible route along the River Cray connecting the town centre to Crayford Meadows and beyond.

Canal-style development fronting, but set well back from, the River Cray would provide the green route with overlooking in an intimate setting. Development should also front Crayford Meadows. Design should maximise opportunities to support the wildlife function these natural assets provide. The lack of a well-defined local context indicates that the natural assets are likely the best inspiration for the design ethos. The opportunity to open the Wansunt River culverted watercourse should be explored.

Water management: The layout and design should respond to the flood risks from all sources, siting development in accordance with the sequential approach to mitigate some flood risks. Flood risk management should be addressed through design to reduce flood risks wherever possible, including siting all living accommodation above the maximum 1% AEP plus climate change flood level. The south west corners of the site bound an area outside the modelled 1% AEP plus climate change extent suggesting this is the safest route for access and egress, but consideration of access and egress routes across the site to this point would be required.

Layout and heights and massing: Blocks should be laid out and orientated to maximise access to and outlook onto the River Cray and Crayford Meadows. Block heights should mitigate the impact on the spacious character of Crayford Meadows, which is designated as Green Belt and Urban Open Space. The layout should also consider providing a buffer between the new blocks and the industrial site to the south, potentially with amenity space or parking provision.

Streets: The site should be served by extending the established route from Maxim Road into a primary road. North/south routes should be created by extending the closes along Wolsley Close in the residential development to the north; these routes would enhance permeability by creating connections across the River Cray and the bridges would enhance access to the Cray by providing spaces to view it from above. Street layouts should also be future-proofed to allow further connections to the south if the adjacent industrial site were to come forward for development, which would allow for uninterrupted connections from Maxim Road to the development at **CRA03: Sainsbury's Crayford**.

Site area (hectares)	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local Plan land use designation
1.744	1b to 2	2 and 3a	Single ownership	Vacant, cleared site	Primarily residential area

Table 38: Former Electrobase/Wheatsheaf Works site summary information

Other guidance

Archaeology: The site is located within a Tier 3 Archaeological Priority Area. The site is 1.74 hectares in size and is therefore determined as High Risk on the Archaeological Risk Model (from the GLAAS Charter). An Archaeological Assessment would be required to be submitted to accompany a planning application.

Risk of flooding: Residential development is classed as more vulnerable and the site is within Flood Zones 2 and 3a. The application of the borough-wide sequential test has demonstrated that residential development is acceptable within the Local Plan sustainable development locations. In addition, the

exception test has been applied. Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in Appendix B of the SFRA Level 2 Report: site ID MS34. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design. The need for compensatory floodplain storage should be discussed with the Council and the Environment Agency.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets. Refer to Bexley SINC Report: River Cray SINC Ref.M106, Crayford Rough SINC Ref.M123, and strategic green wildlife corridor 10. An Ecological Impact Assessment will be required to inform design.

Environmental quality: Road noise affects parts of the site, and air pollution from vehicles and from the adjacent industrial area. Refer to Development Plan policies, and the Local Plan Transport Assessment Chapter 10 on Air Quality.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

CRA02 Tower Retail Park

Tower Park Road, Crayford

SA22 CRA02 Tower Retail Park

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development with commercial uses fronting Crayford Road. The design-led approach for optimising site capacity suggests that a minimum of 360 new homes can be achieved on this site along with, as a minimum, the re-provision of the existing floor space for town centre uses.

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, proposals should retain and enhance the public space focussed on the locally listed Crayford Clock Tower. Proposals should also improve and extend existing routes to establish a legible internal network that connects to the existing street network; one route should extend to a new pedestrian link across Crayford Road, which the developer should contribute to because it would improve onward access to the station and therefore allow for increased densities. Town centre parking should be provided at an appropriate amount and designed to minimise its functional and visual impact.

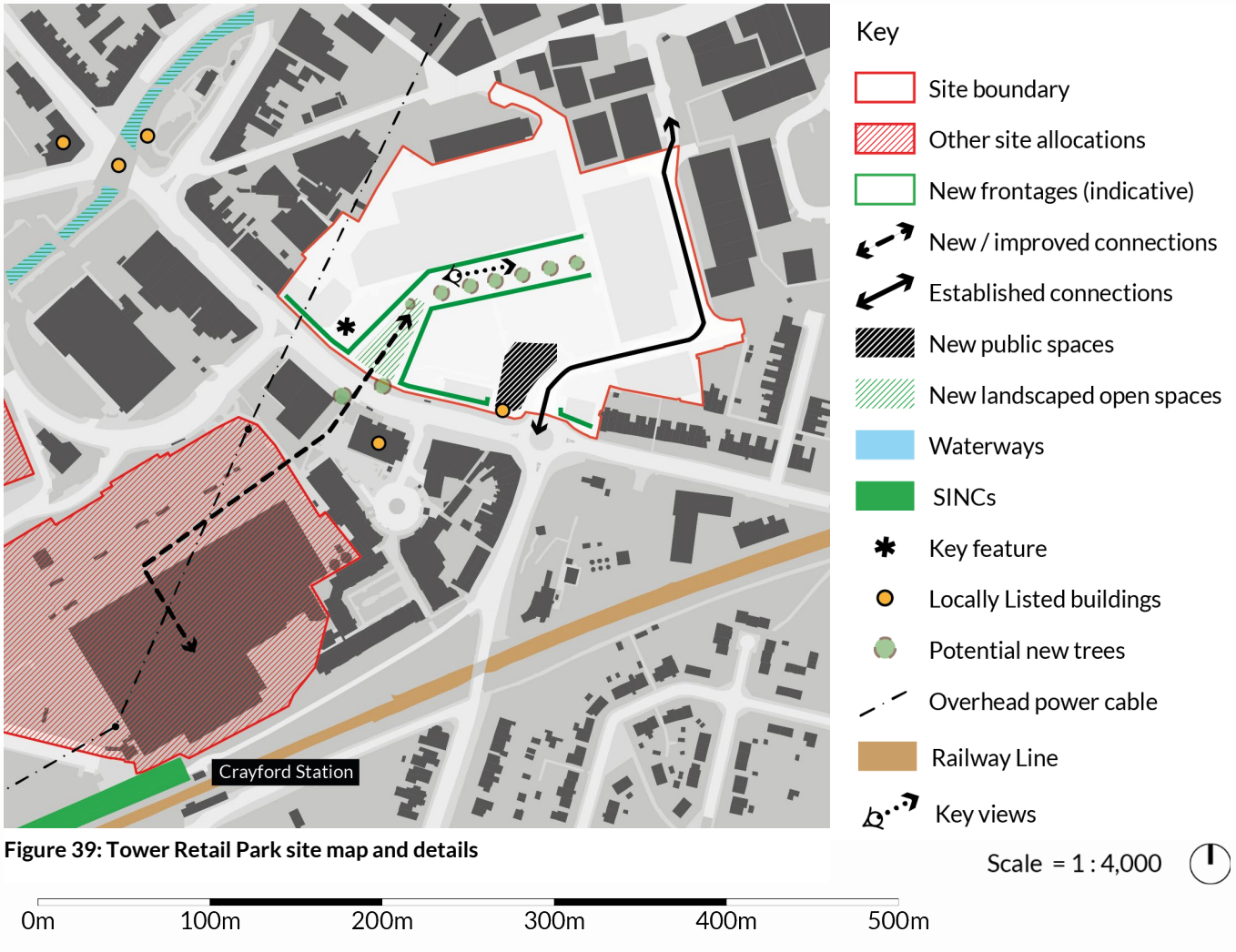


Figure 39: Tower Retail Park site map and details

Site and surroundings

Tower Retail Park is a large brownfield site (3.42 ha) that is located within Crayford town centre. The site is occupied by several retail warehouses arranged around a large surface level car park. As a result, the site creates a large car dominated void along much of Crayford Road, the town centre's main thoroughfare.

Opposite the site, new mixed-use development sits alongside Crayford Town Hall (a locally listed red brick building). Parades of shops go on to define the western stretch of Crayford Road whilst a pocket of terraced houses gives form to its southern stretch.

Industrial uses on industrial land sit behind the site and adjoin its northern and eastern boundaries. Crayford Station is close by and three bus routes (96, 428 and 492) stop directly outside the site boundary.

Opportunities and constraints

Opportunities	Constraints
Intensifying a large site within walking distance to Crayford station with access to moderate levels of public transport provision.	The western corner of the site is crossed by a 275k volt overhead power cable. Development height will therefore be constrained across this area of the site.
Introducing residential development within Crayford's town centre boundary using the footprint of each retail warehouse as a discrete development block.	The site has a single point of vehicular access via Crayford Road and gives access to the neighbouring industrial area. This through route will need to be maintained.
Establishing active frontage along Crayford Road and reducing the dominance of parked vehicles within the street scene.	Development will need to respond to the proximity of industrial uses along the site's northern and eastern boundaries and mitigate for potential amenity issues through building design and layout.
Using the existing pattern of trees across the car park to inform an alignment of new street spaces which would incorporate established planting.	The car park is known to be used almost to capacity during peak hours. Development would therefore be required to identify the extent to which additional parking would likely be required.
Creating new local links across the site between Crayford Road and the River Cray and working with neighbouring sites to improving local permeability towards Crayford station.	The primary vehicular access is from the Crayford one-way system which suffers from congestion and related noise and air pollution.
Improving the setting of the locally listed clock tower and creating a more well-defined public space of which the clock tower can be the focal point.	An 8m offset from any built structure to the River Wansunt culvert which runs under the site should be observed. Refer to other guidance section below for additional information on flood risk.
Opening the River Wansunt culverted watercourse to 'daylight' the river.	This site is located predominantly in flood zone 3a. The River Cray was relocated in the past further up the side of the natural valley. As such it is situated at a higher level than much of Crayford town centre. This means that if water spills over the right bank it will collect at the bottom of the valley, potentially resulting in deep, rapid onset flooding.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Water management: The layout and design should respond to the flood risks from all sources, siting development in accordance with the sequential approach to mitigate some flood risks. Flood risk management should be addressed through design to reduce flood risks wherever possible, including siting all living accommodation above the maximum 1% AEP plus climate change flood level. The south west corners of the site bound an area outside the modelled 1% AEP plus 70% climate change extent suggesting this is the safest route for access and egress, but consideration of access and egress routes across the site to this point would be required. The opportunity to open the Wansunt River culverted watercourse should be explored.

Unlocking development: Explore ways of providing retail parking in a more efficient manner, for instance through multi-storey or integrated within the centre of development blocks, to help free up site area for intensification.

Streets: Consider creating a new primary street that incorporates the row of established trees closest to the current retail frontage. Bend this new street towards Crayford Town Hall and establish a new pedestrian crossing across Crayford Road, establishing the potential for a future route towards Crayford Station via **CRA03 Sainsbury's Crayford**.

Block structure: Each retail warehouse could form the extents of a development block, allowing for a phased approach to redevelopment. The car park could be intensified with two further blocks, establishing a consistent building line along Crayford Road.

Heights and massing: A differentiation in height from 4 to 8 storeys could be used along Crayford Road, stepping up from Clock Tower to reinforce the presence of a new entrance to the site and link between the site and **CRA03 Sainsbury's Crayford.**

Uses: Town centre uses should be located on the ground floor, primarily addressing Crayford Road with residential accommodation above. The existing floor space of commercial, business and service uses on the site should be retained, although can be provided in a different configuration. Town centre car parking could be intensified and incorporated within a new block structure, perhaps located as a buffer to neighbouring industrial uses.

Public realm improvements: The development should help to establish a new material palette within Crayford. The development should contribute to public realm improvements reflecting this palette on and off the site including higher quality paving materials and signage throughout the town centre.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local plan land use designation
3.450	2.588 (assumes residential above ground floor)	2 to 3	2 and 3a	Single ownership	Retail with car parking	District town centre

Table 39: Tower Retail Park site summary information

Other guidance

Car parking: The development must be informed by a parking demand survey looking at demand across the town centre and the role that the site can play in meeting demand. The appropriate amount of car parking should be informed through discussion with the Highway Authority.

Archaeology: The site falls within both a Tier 2 and a Tier 3 Archaeological Priority Area and exceeds 2ha, so the site would be viewed as a Large Major development within the Archaeological risk model. The site is assessed as high risk on the GLAAS model. An application would be required to be accompanied by an Archaeological Assessment/Statement of Archaeological Significance.

Heritage: The Crayford Clock Tower, which is a Locally Listed Building is situated along the site frontage onto Crayford Road. Development would be required to have due regard to the setting of this building by illustrating sensitivity to this designated heritage asset.

Risk of flooding: Mixed use development, where it contains residential development is classed as more vulnerable and the site is within Flood Zones 2 and 3a. The application of the borough-wide sequential test has demonstrated that residential development is acceptable within the Local Plan sustainable development locations. In addition, the exception test has been applied. Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in appendix 2 of the SFRA Level 2 Report: site ID AS58. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design. The need for compensatory floodplain storage should be discussed with the LPA and the Environment Agency.

Biodiversity: An Ecological Impact Assessment will be required to inform design. Refer to Bexley Green Infrastructure Study Chapter 10.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: Road noise affects parts of the site, and air pollution from vehicles and from the adjacent industrial area. Refer to Development Plan policies, and the Local Plan Transport Assessment Chapter 10 on Air Quality.

Electricity transmission: the following publications are available from the National Grid –

- A sense of place – design guidelines for development near high voltage overhead lines; and
- National Grid's guidelines for developing near high voltage overhead lines.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

CRA03 Sainsbury's Crayford

Stadium Way, Crayford

SA23 CRA03 Sainsbury's Crayford

Land use and capacity

1. This site is allocated for residential-led, mixed-use town centre development. The design-led approach for optimising site capacity suggests that a minimum of 448 new homes can be achieved on this site along with, as a minimum, the re-provision of the existing floor space for town centre uses.

Development approach

2. Development of this site should transform the area. As well as meeting other policy requirements, proposals should establish a legible internal network of routes including new connections to Crayford Station, and the developer should contribute to new pedestrian crossings across Roman Way and Crayford Road to improve access to the site and therefore allow for increased densities. Proposals should create a sense of arrival from the station and public open spaces should be provided within the site. Town centre parking should be provided at an appropriate amount and designed to minimise its functional and visual impact. Proposals should not result in harmful piecemeal development either within the site or across the larger urban block.

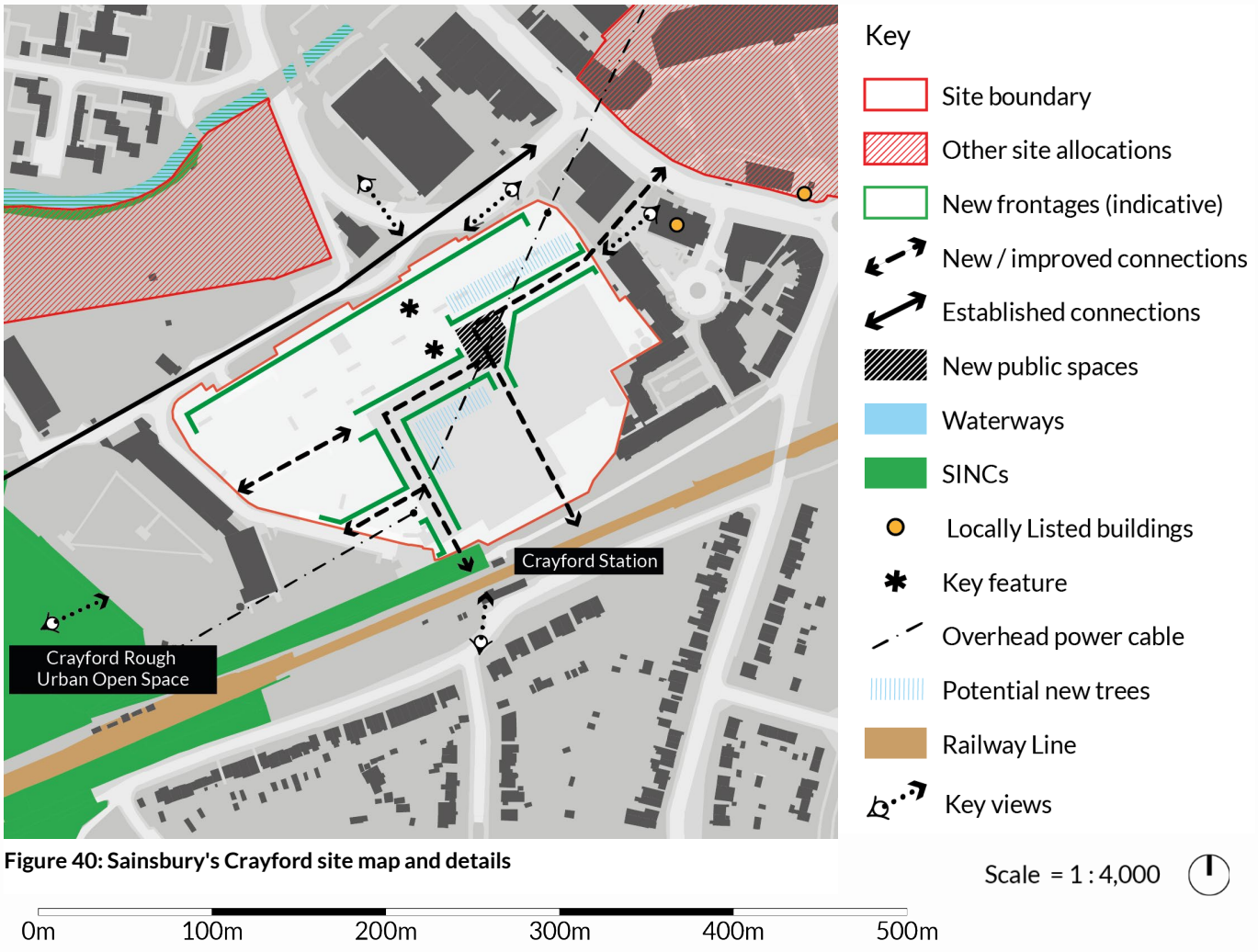


Figure 40: Sainsbury's Crayford site map and details

Site and surroundings

This large brownfield site (2.76ha) is located within Crayford district town centre and is adjacent to Crayford station. It is currently comprised of a large retail warehouse set far back from the street within the associated car parking. A power line runs across the site.

The existing use and arrangement fail to create the pedestrian-friendly, vibrant sense of place that is appropriate for such a well-connected town centre site. The surrounding sites do not offer a well-defined character, except for the neighbouring Town Hall Square development which introduced mixed-use, higher-density development into Crayford, including six-storey blocks of flats and ground floors with retail and community uses.

Opportunities and constraints

Opportunities	Constraints
Creating a new residential-led mixed-use quarter within Crayford town centre to better utilise a sparsely developed site.	Vehicular movements are facilitated by a single connection onto Stadium Way and, though most of the site has a PTAL of 2, a small portion does register as 1 (poor). Without interventions to improve the local highway network and local levels of connectivity, development potential will likely be constrained.
The creation of a significant amount of new development offers the opportunity to establish a dominant new residential character to the north of Crayford station.	The site hosts two pylons, and an overhead 275kV power cable runs between them. The route of the overhead cable is a considerable constraint on development as clearance will need to be maintained to ensure safety.
Improving accessibility levels north of the railway line by establishing new routes through the site between Crayford station, Crayford Road, the green belt, and the wider Crayford area.	'Big box' retail warehousing occupies the southern half of the site with the northern half of the site laid out as surface parking. Phasing will be crucial to ensure that the store remains serviceable and retail activity can continue whist the site is unlocked for intensification.
Creating a new sequence of public spaces, improving Crayford's townscape and reducing the visual dominance of cars and the power line.	The site is located predominantly in flood zone 3a. The River Cray was relocated in the past further up the side of the natural valley. As such it is situated at a higher level than much of Crayford town centre. This means that if water spills over the right bank it will collect at the bottom of the valley, potentially resulting in deep, rapid onset flooding.
Potential to open the River Wansunt culverted watercourse to 'daylight' the river.	An 8m offset from any built structure to the River Wansunt culvert should be observed. The River Wansunt as a culvert poses a potential constraint as the alignment can potentially fall within the boundaries of the site allocation.
	The site is prone to noise pollution from both Roman Way and the railway line with the flat sparely built out site allowing noise to travel far.

Indicative design responses and development parameters

Development capacity: What are considered to be optimum residential development capacities have been established using a design-led approach to site capacity based on the Mayor's Good Quality Homes for All Londoners Consultation Draft SPG. However, the location and size of the site suggest that if circumstances

were to change, a capacity higher than the minimum set in the Policy, which further optimises the use of the site, could be considered.

Urban extension: Such a large site within the town centre and surrounded by fragmented sites presents the opportunity for a bold ambition to create a new piece of town in an 'urban extension.' The site should be conceived as an opportunity to build a new place with a new character.

Water management: The layout and design should respond to the flood risks from all sources, siting development in accordance with the sequential approach to mitigate some flood risks. Flood risk management should be addressed through design to reduce flood risks wherever possible, including siting all living accommodation above the maximum 1% AEP plus climate change flood level. The south east corner of the site bounds an area of Flood Zone 1 and is outside the area of surface water flood risk suggesting this is the safest route for access and egress, but consideration of access and egress routes across the site to this point would be required. The opportunity to open the Wansunt River culverted watercourse should be explored.

Mend the poor character: Development offers the opportunity to mend the poor character exhibited by the current arrangement and uses, with potential to create a strong new character. The northern half of the site should have a strong placemaking ambition along Roman Way, replacing the ill-defined space with an attractive frontage that establishes a strong relationship to the street. This block offers the potential to provide a large format retail offer in a streets-based development. The other main frontage should be at the southern end of the site facing the station. This block and associated public realm should provide a strong sense of arrival from the station. This block should provide a legible connection from the station into the rest of the site and to the town beyond, creating an 'anchor' between the station and town centre. The development should contribute to public realm improvements around Crayford Station and across the local highway network.

A new street network: The very large size of the site and its current lack of well-defined senses of place and setting offer the opportunity to create a 'new piece of town.' Conceiving of the site as an urban extension, development should present strong frontages facing both the Roman Way to the north and the station to the south. A new series of routes across and within the site should create a clear movement hierarchy that facilitates a variety of movement throughout the site as well as connections between the station, town centre and towards the Green Belt. The development should also improve the existing connection to the station provided from the site via the Town Street Hall Square development. Street orientation should be arranged to reduce the visual impact of the overhead power lines within the new streetscape. Stadium Way should be reconfigured as a 'green boulevard.'

Heights and massing: The large size of the site provides opportunities to use differentiations in heights from four to eight storeys to optimise development potential, reinforce the movement hierarchy, frame public realm, and create visual interest. Block heights should consider the potential for views into Crayford Meadows, whilst conversely height and massing should be designed to mitigate any impact on the spacious character of this green belt area. Taller buildings must avoid the overhead power line.

Uses: The site should be largely residential but with significant quantum of town centre uses, particularly at the ground floor, including the provision of a large retail store fronting Roman Way and other retail and commercial uses facing the station. Within the core of the site and without breaking the flow of town centre uses, residential uses may be appropriate at ground floor if mitigated against flooding. Fenestration and other design choices therefore should create a sense of activity and reinforce the movement hierarchy.

Parking provision: The functional and visual impact of car parking should be minimised, for example by incorporating parking within the new block structure. Parking could be positioned as a buffer to neighbouring industrial uses. Proposals should avoid using large portions of the site as surface car parking.

Site area (hectares)	Residential site area (hectares) from mix of town centre uses	PTAL (2031)	EA Flood Zone	Ownership	Current use(s)	Local plan land use designation
3.690	2.768 (assumes residential above ground floor)	1b to 2	1, 2 and 3a	Single ownership	Retail with car parking	District town centre

Table 40: Sainsbury's Crayford site summary information

Other guidance

Car parking: The development must be informed by a parking demand survey looking at demand across the town centre and the role that the site can play in meeting demand. The appropriate level of car parking should be informed through discussion with the Highway Authority.

Archaeology: The site falls within a Tier 3 Archaeological Priority Area and exceeds 2 ha. Development of the site would be considered a 'Large Major Development.' An Archaeological Assessment would need to accompany a planning application.

Risk of flooding: Mixed use development, where it contains residential development is classed as more vulnerable and the site is within Flood Zones 2 and 3a. The application of the borough-wide sequential test has demonstrated that residential development is acceptable within the Local Plan sustainable development locations. In addition, the exception test has been applied.. Refer to Bexley SFRA Level 1 and Level 2, including the flood risk information sheet in Appendix 2 of the SFRA Level 2 Report: site ID MS32. A site-specific flood risk assessment including drainage impact assessment, and detailed drainage strategy will be required to inform design. The need for compensatory floodplain storage should be discussed with the LPA and the Environment Agency.

Biodiversity: Refer to Bexley Green Infrastructure Study, including figures 10.1 and 10.3, which identify biodiversity and geological assets including SSSIs. The site within 470m of Wansunt Pit SSSI. Also refer to Bexley SINC Report: Crayford Rough SINC Ref.M123 and strategic green wildlife corridor network map, corridor 8. An Ecological Impact Assessment will be required to inform design.

Trees: Quality trees should be identified at the start of outline design proposals so that layouts can take these, and other existing green infrastructure, into account early on and flag up any challenges in their retention. Proposals will be required to undertake an arboriculture assessment. Also refer to the Bexley Green Infrastructure Study (Chapter 9 on urban greening).

Environmental quality: Road and rail noise affect parts of the site, as does air pollution from vehicles. Refer to Development Plan policies, and the Local Plan Transport Assessment Chapter 10 on Air Quality

Electricity transmission: the following publications are available from the National Grid –

- A sense of place – design guidelines for development near high voltage overhead lines; and
- National Grid's guidelines for developing near high voltage overhead lines.

Other requirements: The Council website provides information on **applying for planning permission**, including details of what checks and planning application requirements are needed before submission.

Annex C – Local Plan Housing Trajectory

BEXLEY LOCAL PLAN HOUSING TRAJECTORY (2021 - 2038)

Count	Reg 18 Site ID	Planning reference/ Reg 18 source	Reg 19 Site ID or permission date	Development name or site name and address	existing units	gross site area (ha)	residential site area (ha)	proposed units/ design-led gross capacity	design-led density (dph)	design-led net capacity (minimum)	2021/22 to 2025/26	2026/27 to 2028/29	2029/30 to 2033/34	2034/35 to 2037/38	2038/39 to 2040/41
REG 19 DRAFT LOCAL PLAN SITE ALLOCATIONS															
1	TA002	2017 SHLAA	SA1-ABW01	Felixstowe Road Car Park, Abbey Wood	0	0.545	0.408	90	220	90	0	90	0	0	0
2	TA003	2017 SHLAA	SA2-ABW02	Lesnes Estate (Wolvercote Road) and Coraline Walk, Abbey Wood	746	11.070	9.307	1,849	199	1103	0	221	368	294	221
3	BV001	2017 SHLAA	SA3-BEL01	ASDA and B&Q Belvedere, Lower Road, Belvedere	0	3.315	2.487	457	184	457	0	0	190	152	114
4	BV002	LB Bexley	SA4-BEL02	Station Road East, Belvedere	0	0.630	0.473	81	171	81	0	0	81	0	0
5	BV004	2017 SHLAA	SA5-BEL03	Station Road West, Belvedere	17	0.304	0.228	38	167	21	0	0	21	0	0
6	BV013	LB Bexley	SA6-BEL04	Land adjacent Woodside School, Halt Robin Road, Belvedere	0	1.320	1.229	138	112	138	0	69	69	0	0
7	BV007	Call for Sites	SA7-BEL05	Belvedere Gas Holders, Yarnton Way, Belvedere	0	3.890	2.220	395	178	395	0	79	132	105	79
8	BV010	Call for Sites	SA8-BEL06	Monarch Works, Station Road North, Belvedere	0	0.630	0.630	90	143	90	0	45	45	0	0
9	BV012	Call for Sites	SA9-BEL07	Crabtree Manorway South, Belvedere	0	5.971	5.271	741	141	741	0	148	247	198	148
10	ER006	2017 SHLAA	SA10-ERI01	Erith Western Gateway, Bexley Road, Erith	129	3.000	2.508	443	177	314	0	63	105	84	63
11	ER007	2017 SHLAA	SA11-ERI02	Pier Road West, Erith	8	1.391	1.043	192	184	184	0	69	115	0	0
12	ER008	2017 SHLAA	SA12-ERI03	Pier Road East, Erith	0	0.841	0.631	112	178	112	0	0	112	0	0
13	ER012	Call for Sites	SA13-ERI04	Erith Riverside, Wheatley Terrace Road, Erith	0	2.620	2.620	287	110	287	0	0	96	96	96
14	ER011	2017 SHLAA	SA14-ERI05	Morrisons Erith, James Watt Way, Erith	0	3.190	2.393	421	176	421	0	0	0	211	211
15	BH002	2017 SHLAA	SA15-BXH01	Former Bexley CCG Offices, Erith Road, Barnehurst	0	1.850	1.850	182	98	182	0	91	91	0	0
16	BH005	2017 SHLAA	SA16-BXH02	Bexleyheath Town Centre East, Broadway, Bexleyheath	0	0.810	0.608	134	221	134	0	0	0	67	67
17	BH010	2017 SHLAA	SA17-BXH03	EDF Energy, Broadway, Bexleyheath	0	1.482	1.482	200	135	200	0	100	100	0	0
18	BH016	2017 SHLAA	SA18-BXH04	Buildbase Bexleyheath, Pickford Lane, Bexleyheath	9	0.302	0.226	32	141	23	0	23	0	0	0
19	BH012	2017 SHLAA	SA19-BXH05	Pepper's Builders Merchants, Rowan Road, Bexleyheath	0	0.282	0.282	29	103	29	0	29	0	0	0
20	BH001	Call for Sites	SA20-BXH06	Land behind Belvedere Road, Bexleyheath	0	1.344	0.944	85	90	85	0	85	0	0	0
21	CR005	2017 SHLAA	SA21-CRA01	Former Electrobase/Wheatsheaf Works, Maxim Road, Crayford	0	1.744	1.744	300	172	300	0	60	100	80	60
22	CR001	2017 SHLAA	SA22-CRA02	Tower Retail Park, Tower Park Road, Crayford	0	3.450	2.588	360	139	360	0	0	0	180	180
23	CR003	2017 SHLAA	SA23-CRA03	Sainsbury's Crayford, Stadium Way, Crayford	0	3.690	2.768	448	162	448	0	0	0	224	224
					909	**53.671**	**43.938**	**7,104**	**162**	**6,195**	**0**	**1,172**	**1,871**	**1,690**	**1,462**
5-YEAR HOUSING LAND SUPPLY (2021 - 2026) LARGE SITES															
1		14/02155/OUTM	16/12/2016	Erith Hills, Fraser Road, Erith (all phases)	95	10.766	7.690	600	78	505	390	0	0	0	0
2		16/01287/OUTM	22/12/2016	Southmere Village Phase 2, Binsey Walk, Abbey Wood	70	2.473	2.473	329	133	259	259	0	0	0	0
3	SID001	18/01214/FULM	23/07/2019	Co-op Food, Station Road, Sidcup	0	0.320	0.320	59	184	59	59	0	0	0	0
4	ER015	19/02274/FULLM	28/01/2020	35 - 37 Lesney Park Road, Erith	0	0.578	0.578	25	43	25	25	0	0	0	0
5	ER017	18/03154/FULM	19/09/2019	Arthur Street Estate, Erith	263	2.254	2.254	320	142	57	57	0	0	0	0
6		18/02135/OUTM	19/12/2019	Land East of Junction of Yarnton Way & Picardy Manorway, Belvedere	0	0.280	0.280	69	247	69	69	0	0	0	0
7	CR007	19/00941/FULM	10/03/2020	Barnes Cray Farm, East of Maiden Lane, Crayford	0	0.330	0.330	35	106	35	35	0	0	0	0
8		08/11096/FULM	04/12/2013	Ballast Wharf, West Street, Erith	0	0.401	0.401	54	135	54	54	0	0	0	0
9		15/00370/OUTM	13/10/2016	Egerton Place, Slade Green Road, Slade Green	117	3.768	3.768	336	89	219	219	0	0	0	0
10		16/01251/FULM	22/12/2016	Southmere Village Phase 1, Yarnton Way/Harrow Manorway, Abbey Wood	0	4.068	4.068	533	131	533	533	0	0	0	0
11	BH006	17/02745/FULM	17/09/2018	Eastside Quarter, Broadway, Bexleyheath	0	1.580	1.580	518	328	518	518	0	0	0	0
12	ER005	18/01437/FULM	20/03/2019	156-168 West Street, Erith	0	0.460	0.460	42	91	42	42	0	0	0	0
13		17/00577/OUTM	31/05/2017	Old Farm Park, Old Farm Avenue, Sidcup	0	1.430	1.430	60	42	60	60	0	0	0	0
					545	**28.708**	**25.632**	**2,980**	**116**	**2,435**	**2,320**	**0**	**0**	**0**	**0**

LOCAL PLAN HOUSING TRAJECTORY		NPPF AND LONDON PLAN HOUSING REQUIREMENTS		FIVE YEAR HOUSING LAND SUPPLY FIGURES	
7,053	large sites identified above (2021 - 2038)	8,220	London Plan housing requirement (2026 - 2038)	163	units from other large sites
163	other large sites from 5-year supply (2021 - 2026)	4,110	5-year supply requirement (London Plan x5 years and NPPF 20% buffer) (2021 - 2026)	1,676	small sites (includes windfall allowance)
3,660	small sites windfall allowance (2026 - 2038)	12,330	17-year housing requirement (with 20% buffer for the 5-year supply) (2021 - 2038)	4,159	Five-year housing land supply (2021 - 2026)
1,676	small sites contribution from five year housing land supply	685	annualised London Plan housing target for Bexley	59.70%	Percent of 5-year supply from large sites
12,552	17-year housing trajectory (includes 20% buffer for the 5-year supply) (2021 - 2038)	56.39%	percent of Local Plan housing trajectory from large sites	40.30%	Percent of 5-year supply from small sites
699	Local Plan housing trajectory average annual supply (2026 - 2038)	43.61%	percent of Local Plan housing trajectory from small sites		

Table 41: Local Plan housing trajectory from large sites and large developments with planning permission (see Table 3 in Part 1 of the Local Plan for a summary of the housing trajectory). NOTE: the housing trajectory will be kept up-to-date and is included here for information